



Fw: Proposed Rate Change

to: premiumrateincreases

07/16/2014 12:24 PM

History:

This message has been replied to.

Good Morning,

██████████
Empire Health Choice HMI, Inc.
Empire Platium Guided Access ceaf
Individual Coverage
HIOS Identification #: ██████████

I am in receipt of a letter stating a possible rate increase on my Empire HealthChoice HMO.

Taking advantage of the opportunity to respond I hope mine & other comments such as mine do not go unnoticed .

I find this an OUTRAGE! How is this AFFORDABLE HEALTH CARE! We the working class people were forced to change, what in my case was as adequate policy, to adhere to the Presidents new bill. Those who did not have insurance are now being subsidized and guess who is paying for it?

"THE WORKING CLASS AMERICAN PEOPLE!" How could anyone think that insurance payouts would not increase when the President forced everyone to have insurance. This is what should have been thought about before the bill was passed.

I am a single woman (61 yrs old) barely making ends meet but have the vision to know and recognize the importance of health insurance. At this stage in my life retirement should be a stones throw away BUT as a result of our economy that dream is no where in the immediate future for me!

When a new policy had to be implemented, after months of research, I choose a higher monthly premium policy with little to no deductables so I would not be taken to the poor house in the event I encountered surgery and/or was hospitalized.

NOW, not even a year into our dear Presidents's AFFORDABLE HEALTH CARE ACT I am being told there will be a possible 18% increase upon renewal. I would feel the same about any increase.

As an American with Freedom to Speak hereby state:

THIS IS LUDICRIOUS! DISGUSTING! UNFAIR! HORRIBLE! and down right NAUSIATING that as an American my government is too shallow to have realized this was not going to help its people but to put more and more financial pressure upon > them.

I am counting on the fact that this letter will be posted on the DFS website, as stated in the letter. There is power in numbers and I cannot believe that other Americans do not feel the same as I do.

Our forefathers fought for independence and freedom and we seem to being going in the opposite direction. It is more like a dictatorship when our government TELLS you what you MUST do and does not give you the option to CHOOSE.

Why should I continue to work and keep paying higher & higher premiums? I may

be forced to work less hours and just let my insurance be subsidized too! How would that work if everyone felt the same way. Am I angry? Darn Right! Let's see if it matters!





Empire HealthChoice HMO, Inc.

individual

hmo



Hi, I know you need the following information: My insurer's name: Empire HealthChoice HMO
Empire benefit plan: Empire Silver GuidedAccess (cbnw) Coverage: individual HIOS ID #

 Some comments on the proposed rate increase. ? a plan increase of 18.4% is a lot for a 1-year increase. (Salaries & project fees are not keeping up by any means). ? all the plans (except at the very highest level) are HMOs, which I dislike intensely since having to get approval from a primary care doctor to see even a dermatologist has always bothered me. ? since HMOs don't allow you to keep your doctors unless they are in-network you have to switch doctors all the time or pay out-of-pocket. Having confidence in a doctor is something that develops over time so switching is a BIG deal. ? AND, these plans don't even let you apply any out-of-network expenses towards your deductibles. ? I understand that insurers are giving coverage to make the majority happy not an individual but as more of the US workforce is becoming freelance/consultant/part time career people through corporate planning (so no benefits need to be paid) medical insurers have individuals at their mercy. ? After extensive research & thought I picked this plan because the coverage/deductible rates were more realistic than the Bronze plans while the Gold plans weren't cost effective for me since those plans covered things I wouldn't use. ? I've always realized that you have to pay for any decent medical care but so often what is approved/allowed I don't need or want. My Empire Silver plan is insurance in case something major comes up ? I don't like that it has to be that way. ? I've always had medical insurance. As a freelance designer/art director I've almost always had to pay my own way but at least I could apply my out-of-network expenses towards my deductibles. ? I understand how complicated American Health Care is but I believe the insurance companies & politics are the major players NOT doctors & health care professionals. When you realize that there are other countries that have better health care than the US that's very sobering. Sincerely,

 PS: Health insurers want you to think that they are concerned about your health but so often it all seems to be about the money. Case-in-point: my monthly premium payment is due by the 1st of each month. On April 28th I received a letter stating my coverage would be terminated since my May payment had not arrived. Since the letter had come through the mail it had to be generated by the 26th the latest. Interesting, hmmm. It made me realize what was important to Empire.



Objecting to Empire's request due to skimpy coverage

[REDACTED] to: PremiumRateIncreases

07/16/2014 04:39 PM

Cc: [REDACTED]

History: This message has been replied to.

Here are comments on rate increase per your letter of June 17th:

Insurer: Empire HealthChoice HMO Inc. (purchased through exchange)

Plan: Empire silver guided access

I have in [REDACTED] rage"

HIOS ID: [REDACTED]

This increase is NOT ACCEPTABLE unless Empire widens its network to include both Stony Brook Hospital and Mather Hospital, as well as all providers associated with those hospitals, and includes more drugs in its Rx reimbursement. Under current conditions the nearest hospital which accepts our plan is over an hour's drive away, on roads which are dangerous in winter. Most of the local doctors are also not available to us. I had Empire when I had employer coverage, for many years, and it was never not accepted. I chose them in good faith on the exchange thinking they would offer decent coverage. These new fraudulent un-affordable care act exchange-sold plans are not worth the cards they are printed on because no one accepts them and they cover very little. If Empire wishes to increase rates then it must actually attempt to deliver health care we can use, by making SBU and Mather hospitals part of its network. It needs to make these exchange-sold plans commensurate with its other plans. I purchased an Empire plan in good faith and consider Empire in serious breach of contract due to the lack of coverage available through these plans. Currently I am getting almost nothing in return for my premium because no accepts this plan and its so called prescription coverage does not cover the few prescriptions I actually have. : if they are to increase rates they had very well better increase network and Rx coverage!

Thank you.



Prior Approval Submission
NYS Department of Financial Services
To: PremiumRateIncreases

07/16/2014 04:45 PM

Empire HealthChoice HMO, Inc.

individual

hmo



The proposed increase in rates is a national outrage and will destroy the very fabric of our society which is small business owners who pay directly out of pocket for their health insurance. Why not have a plan for those who are healthy business owners before you put them out of business and before they are faced with having health insurance or paying for other necessary items. Please keep me informed of all public hearings and do not pass upon these double digit increases!



History:

This message has been replied to.

To: NYS Department of Financial Services

About: Proposed Premium Rate Increase

From:

Our Insurer: Empire HealthChoice HMO, Inc.

Empire Benefit: Empire Silver GuidedAccess w/HSA cdib

HIOS identification number:

Individual Coverage

We recently received the notice of proposed premium increase for 2015 from Empire Blue Cross Blue Shield and we would like to register here our total disagreement with it. The fact that we are receiving this notice after being enrolled in the health plan for just a few months makes us question the legitimacy of New York State of Health and Empire Blue Cross Blue Shield.

First of all we are not even satisfied with the service we are receiving which makes the 18.3% request of raise sound even more inappropriate. We had a hard time finding doctors in the network since Empire does not keep its list of doctors updated on the website. After frustrated attempts of finding doctors online, we finally called Empire to ask for help and they could then find a Primary Care Physician (PCP) for us. It was too bad that the doctor's phone number was wrong and office location was also wrong. At the end we found out the doctors Empire set as our PCPs do not accept new patients and the worst, do not accept our plan. It was an embarrassing and very frustrating experience.

Our current monthly premium is \$835.14. We are paying that amount monthly and when we go to the doctor we should be able to use that money but no, we have to pay more because we have a deductible of \$2450 individual, \$4900 total. Where is the premium payment going to while we are still paying deductible? We will enjoy the benefit of our insurance (monthly payment of \$835.14) when we have spent the deductible and even after that we will still pay 10%. That is already too much! An increase of 18.3% in our premium is going to take that monthly cost up to \$987.97. Not acceptable.

The reasons why Empire is requesting a rate increase do not justify. They say it reflects the rising cost of medical care and some other fees and taxes. We believe that what we are already paying is more than enough to cover that. Again, we are paying \$835.14 monthly and not using it until we have spent \$2450 each one of us. Please use that money we are spending and not getting any benefit from to pay for your expenses. We also pay taxes and cannot afford paying for theirs right now.

Another reason for an increase according to Empire is that "more benefits will be available to more people". What does that mean exactly? They are going to increase our payment so other people may have benefits? We are paying individual coverage, we cannot afford supporting other people here. Thank you but we already have our way to do charity. Also "inclusion of, or changes to, Pediatric Dental benefits" does not apply to us, we do not have children and cannot

afford paying more so children that we do not have may benefit from our money.

A rate increase sounds awful under these circumstances and we do not feel like we are going to receive any benefit from it if approved. In that case we will have to look for an alternative because we will not accept an increase.

We hope that our voice will be heard and taken into consideration.

Thanks for your attention.

Sincerely,

[REDACTED]



Prior Approval Submission
NYS Department of Financial Services
To: PremiumRateIncreases

07/16/2014 05:34 PM

Empire HealthChoice HMO, Inc.

individual

hmo



PLEASE DO NOT GIVE THESE UNEDUCATED IDIOTS A PREMIUM RATE INCREASE
!!!! They constantly perform major errors on EOB's...explanation of benefits !!! Over 5 months
and they still can't correct their mistakes. They are outsourcing the work to India at a fraction of
their stated labor costs!!! [REDACTED] Blue cross CEO is an absolute IDOT ... a lard-ass who
shouldn't be paid a penny...If he took responsibility for all the wasted \$\$\$ Blue cross spends on
re-doing over and over their mistakes, then they wouldn't need a rate increase!!!



Prior Approval Submission
NYS Department of Financial Services
To: PremiumRateIncreases

07/16/2014 05:47 PM

Empire HealthChoice HMO, Inc.

individual

hmo

[REDACTED]

My name is [REDACTED] My HIOS id. number [REDACTED] I enrolled through New York State of Health, the state's health plan and I qualified for financial assistance (APTC). My current premium is less than \$571.30. (It's been difficult to make the premium payments at the rate they are at now.) I haven't been able to afford health insurance without the assistance. I am a struggling musician and I don't have a steady salary. I was so excited that I could finally afford to get health insurance. I hope this will be able to continue in 2015 without an increase in my premium. I haven't cost the health care system a nickel. I am thirty-one. I am a healthy single male. I never smoked. I haven't made a claim for medication or doctors since I have had this insurance. I haven't made any claims at all. I hope you take this into consideration. Please don't raise my premiums. I was so happy this year cause I could finally afford to have health insurance. [REDACTED]



Empire BlueCross BlueShield rate increase proposal

Kathy B to: PremiumRateIncreases

07/17/2014 10:45 AM

History:

This message has been replied to.

To Whom It May Concern:

I am currently insured with BCBS for my individual coverage. My information is as follows:

Insurer: Empire HealthChoice HMO, Inc.

Benefit Plan: Pathway Enhanced

HIOS ID number: [REDACTED]

I chose this plan as I did not want to be in the marketplace/exchange because I wanted to keep my doctors. Unfortunately, my doctors think I am in the marketplace/exchange due to a letter BCBS sent to them concerning policy numbers beginning with JLD, which mine does, are in the marketplace/exchange. However, every time I contact BCBS, they tell me I have an individual policy and am not through the marketplace/exchange.

Now they want to increase the premium on the insurance of which I am not able to use as I have been unable to find a doctor. As is, I am paying \$477.29 a month for coverage which includes a \$1,000. deductible on specialist plus no vision coverage and limited other types of coverages. I realize medical bills are expensive but I haven't even used my policy to go to a doctor as I haven't been able to get one. Thus I am basically paying for nothing. Now they want to up the premium by 18.5%. That would be \$85. increase per month. I can barely pay the premium as is. I ask you please to consider carefully on the justification of raising a premium on a plan that I can't use. Even if I find a doctor, the cash I would have to outlay is substantial, especially for specialist. I don't have that type of money. and I definitely wouldn't have it if the premium increases.

Again I beg of you to please think of the consumers such as myself who are having difficulty as is getting by. An increase of 18.5% is to much for myself and others to afford.

Thank you for your time and consideration. I wait for you decision.

Sincerely,

[REDACTED]



Comments/Questions

[REDACTED] to: PremiumRateIncreases

07/17/2014 01:15 PM

History:

This message has been replied to.

Re: EmpireHealthChoice HMO, Inc.

Empire Gold GuidedAccess ccav

Individual Coverage

HIOS ID# [REDACTED]

1> Please provide me any information on this new proposed increase of 18.4% for 2015

I am very concerned about two things: percentage rate increase on deductible/copay costs of all benefits concerned: hospital stays, prescriptions, laboratory costs, etc.

Secondly, Will New York State provide options through the Exchange in order to downgrade on health plans prior to 2015?



Empire HealthChoice HMO, Inc.

individual

hmo



EBCBS ? the ONLY carrier in my area - refuses to allow me to pay MORE to secure the only type of coverage that I can use (out of network); on Christmas Eve, 2013, they withdrew me from a policy they had enrolled me in, after deliberately misleading me for years. They put me in a policy, which is of virtually no use to me, and which I discovered does not even pay for ?in network? costs. They also refuse to pay for people with preexisting conditions, in violation of the ACA. It would be IMMORAL to allow EBCBS to raise their rates, when their premiums already cover barely anything, and they have manipulated their policies to hurt their members and help themselves. If the ACA was supposed to reduce premiums, why have everyone?s premiums been increased exponentially, while, correspondingly, their coverage has been degraded? Why, also, have you allowed people to lose their doctors, after we were promised that we could keep them? I have attempted to appeal my case to your department, and will be appealing it through legal channels and in the media soon. Please omit my personal information on this posting.



Prior Approval Submission
NYS Department of Financial Services
To: PremiumRateIncreases

07/17/2014 09:19 PM

Empire HealthChoice HMO, Inc.
individual
hmo



My insurance company has applied for an 18,5% increase in 2015. this is highly exhorbitant and will cause me to drop my insurance since I still have no job this is catastrophic to a person in my condition. Please reject



My Empire BCBS Health Insurance Rate Increase

[REDACTED] to: premiumrateincreases

07/17/2014 11:53 PM

History:

This message has been replied to.

Dear NYS Department of Financial Services,

I am writing you regarding the Notice of proposed premium rate change.

My current premium is \$168.65, I cannot afford health insurance at your proposed rate of \$438.85 for the year 2015, and disagree with the increase, based on my income.

I was under the impression that you were helping by offering all americans affordable health care. This is insulting and would like to receive additional information and to speak with an actual person regarding this matter.

The following is the information you requested:

Name of Insurer: Empire HealthChoice HMO, Inc.

Name of Benefit Plan: Empire Silver Guided Access cbny

Type of Coverage: Individual

HIOS Identification Number: [REDACTED]

Thanks so much,

[REDACTED]



Prior Approval Submission
NYS Department of Financial Services
To: PremiumRateIncreases

07/17/2014 11:57 PM

Empire HealthChoice HMO, Inc.
individual
other



Dear NYS Department of Financial Services, I am writing you regarding the Notice of proposed premium rate change. My current premium is \$168.65, I cannot afford health insurance at your proposed rate of \$438.85 for the year 2015, and disagree with the increase, based on my income. I was under the impression that you were helping by offering all americans affordable health care. This is insulting and would like to receive additional information and to speak with an actual person regarding this matter. The following is the information you requested: Name of Insurer: Empire HealthChoice HMO, Inc. Name of Benefit Plan: Empire Silver Guided Access cbny Type of Coverage: Individual HIOS Identification Number: [REDACTED] Thanks so much, [REDACTED]



Please DENY Empire BlueCross Blue Shield Premium Rate Increase Request

██████████ to: PremiumRateIncreases

07/18/2014 04:22 AM

History:

This message has been replied to.

Dear DFS,

I respectfully and desperately request that you categorically deny the 2015 premium rate change sought by Empire BlueCross Blue Shield.

The proposed rate change for my individual health insurance plan is 10.8%.

My plan is Empire Essential Guided Access w/Child Dental - cdce
Health Insurance Oversight System (HIOS) Identification number: ██████████

Empire BlueCross Blue Shield has sought -- and received -- annual rate increases of close to 10% for the last several years, inflating the cost of my personal policy from its original rate of about \$300 per month to more than \$500 per month for 2015 if this rate increase is approved.

Empire BlueCross Blue Shield's rate requests are outrageously out of touch with our current economy. Salaries have not increased by almost 11% in the past year. To grant such a rate increase to a giant insurance corporation at the expense of struggling New York small business owners like myself would be criminal. As it stands right now, I am paying more than 10% of my annual salary (after taxes) for my health insurance alone. Now I am being asked to pay an additional \$600 a year for the very same coverage!

Empire BlueCross Blue Shield not only received a rate increase last year, but then immediately ended my previous plan and put me on a new plan with less desirable coverage FOR THE SAME MONEY. I can no longer go to all the doctors I had longstanding relationships with while using my original Empire/Healthy New York coverage because Empire changed my plan to one that my doctors will no longer honor. I wish I could participate in a better plan that is accepted by my previous doctors (as they honored my previous Empire BlueCross coverage under Healthy New York) but as a struggling small business owner still feeling the effects of the recent recession, I simply can't afford it.

Now Empire BlueCross Blue Shield is trying to squeeze even more money from me for this second-rate coverage.

PLEASE DO NOT GRANT THE REQUESTED RATE INCREASE. I CANNOT AFFORD IT. NEW YORK SMALL BUSINESS OWNERS CAN'T AFFORD IT.

Sincerely,

████████████████████
████████████████████
████████████████████



Empire HealthChoice HMO, Inc.

individual

hmo



This is the third form I am filling out. I filled a complaint with the NY State Department of Financial Services as well. My complaint # [REDACTED]. My first comment was filled 7/15/14. Today is 7/18/14. I want to make sure my third comment is filed on time. My name is [REDACTED]. My insurer is Empire HealthChoice HMO, Inc. I have individual coverage. They want to raise my premium rates 18.4% for 2015 even though I have never made a claim. I am a single male. I am in excellent health. I do not smoke or drink. I eat a healthy diet. I work out and I am not overweight. (I am not a liability for this company and I don't have any previous existing health issues) They should be thinking of lowering my premiums instead of raising them. My HIOS ID# IS [REDACTED] My Empire ID# 129A80292 I have already qualified for financial assistance. I hope to qualify next year as well. I hope you'll continue to support my eligibility for financial assistance. This support is crucial to my ability to make payments towards my premiums. I appreciate the financial assistance more than you can know. It feels great finally having health insurance. I have not made a claim but I am happy I have health insurance just to be safe. Thank you for considering possibly not to raise my premiums. With my deepest gratitude, [REDACTED]



Fwd: Premium Rate Increases asked by Empire Blue Cross Blue Shield

██████████ to: PremiumRateIncreases@dfs.ny.gov

07/19/2014 12:33 AM

History:

This message has been replied to.

Please find my resent email below. I wrote your email address incorrectly the first time.

██████████

Sent from my iPhone

Begin forwarded message:

From: ██████████ ██████████
Date: July 19, 2014 at 12:24:13 AM EDT
To: "PremiumRateIncrease@dfs.ny.gov" <PremiumRateIncrease@dfs.ny.gov>
Subject: Premium Rate Increases asked by Empire Blue Cross Blue Shield

Dear Sirs & Madams of the NY State Department of Financial Services:

I would like to comment moments before tonight's deadline about the rate increases which my insurer Empire Blue Cross Blue Shield, under their Empire Health Choice HMO via the Marketplace, has requested.

I have individual coverage in the Silver Guided Access Plan, Plan Code number CBNW, with my HIOS number being ██████████.

I cannot begin to include all the reasons that an 18% increase in this company's rates for 2015 would be absolutely wrong, almost a crime after the absolutely awful service and difficulty I have experienced for all the almost 7 months I have been covered by them. It would be an outrage to let them have that kind of increase. And I expect your department not to let that happen.

The difficulties and incidences are far too numerous to relay here, suffice it to say that every month I had to fight to get my benefits, to get help, to hold their feet to the fire, to even get them to acknowledge my payments, and had to contact my local and Federal officials numerous times for help, along with writing to the President of Empire twice.

I feel like I should be paid by them for all the constant work I have had to do, weekly, and sometimes daily! With a major chronic disease, this has been a cruel fate to have to stay on top of them and all the problems they have caused me.

You must also be well aware, that this well-established company had to offer 3/4 refunds to thousands of their new Marketplace customers for for serious, even dangerous shortcomings which included these new customers not being able to either see

their doctors or to get their medicines. Only through constant effort every day of January was I able to get my absolutely important, but very costly disease-modifying medicine. It was a nightmare dealing with them. And they only gave refunds to these less tenacious customers because they received the highest number of complaints from their customers, I'm guessing to our respective elected officials, who began to hold hearings to investigate them by March. That was simply a PR stunt to stop the chatter and bad press. But have they significantly improved their services? I would say no, not in my experience.

And the same thing just happened to me during the entire month of June in trying to get my drug. It took me the whole month till Friday June 27th to get final definitive approval onto order this specialty drug, which I had run out of by that date. It was so cruel, and they are so poorly set up, you'd think they just went into this business!

It would be a travesty to "reward" this company for such continued shortcomings and lack of service or access that an 18% increase would offer them. Please do NOT give them such an increase. Until such time as they actually get their acts together, any increases should be kept to a bare minimum.

Thank you for your time and consideration of my most serious request,





Rate increase

to: premiumrateincreases

07/19/2014 02:24 PM

History:

This message has been replied to.

As a part-time and self-employed writer/editor with health conditions that require me to use two medications on a daily basis, I must pay health insurance out of pocket, and none of the subsidized plans are workable for me due to the large deductible, should I even qualify based on income.

Paying the \$573 bill each month in addition to the pharmacy payments is extremely difficult for me, coming on top of payments for my daughter's health insurance, orthodontist, student loan payments for myself, upcoming college payments for my daughter in 2015, car payments -- not to mention the everyday expenses of life.

I implore you to refuse this rate increase requested by Empire. Why should hardworking people like me feel the brunt -- every day -- of a giant company's desire to make yet more money? To approve this increase would be unconscionable.





Prior Approval Submission
NYS Department of Financial Services
To: PremiumRateIncreases

07/19/2014 05:20 PM

Empire HealthChoice
HMO, Inc.
individual
hmo



The ACA reimburses doctors at the same rate of medicaid, so virtually NO ONE in Manhattan takes it. I had to switch ALL of my doctors. I've been paying \$620/month for, what is essentially, medicaid--which people get for free. Now they're going to raise the premiums by 18.4%. So I will be paying \$735/month for "medicaid." That is unbelievably unfair. Please do not approve this premium hike.



Prior Approval Submission
NYS Department of Financial Services
To: PremiumRateIncreases

07/21/2014 11:12 AM

Empire HealthChoice HMO, Inc.

individual

ppo



I have received notice of an 18% increase in my insurance, which is so outrages. Both myself and my wife own a 2 person business. Prior to this policy I was insured with Healthy NY which I couldn't renew. I went on the exchange to purchase my current Empire Essential policy with a high deductible, at a cost double what I paid the year before.. Now I'm being told that I will have an 18% increase!!!! This just isn't right. Now what I'm I supposed to do? My income is less and now over a period of 2 years my health insurance will increase by 118%... Who is responsible for miscalculating this years premiums.. I'm sure the changes last year would have been fought harder if everyone knew that premiums would jump up an additional 18% in year 2..Now what is going to happen the following year? Are they going to tell us they have to increase the premiums 20%? I make enough money to to qualify for subsidies but where does it end....



Prior Approval Submission
NYS Department of Financial Services
To: PremiumRateIncreases

07/21/2014 02:41 PM

Empire HealthChoice
HMO, Inc.
individual
hmo



I currently have individual coverage with Empire HealthChoice HMO, Inc. under a Health Exchange Policy called Empire Gold Guided Access. My HIOS identification number is



I wish to comment on the proposed premium rate change which, in a letter from Empire Blue Cross Blue Shield, I am informed will be a request for a premium increase of 18.4%. It is astonishing that not a full year into the Affordable Care Act, a large insurer such as Empire BCBS should request such an exorbitant increase, giving as one reason the rising cost of medical care. Surely after six months, the data can not yet confirm that supposition. Even more suspect, Empire links the rising cost of medical care to a new pool of

customers? and ?our new provider networks??but these are aimed at bringing in a larger number of premiums paid to the insurer to help lower costs, not raise them. When Empire also complains that ?more benefits are available to more people,? Empire again chooses not to acknowledge that more people?and presumably a younger demographic base?is now contributing premium payments to its coffers, the result of which should be to enable the company to cover more benefits. That health care in this country is unacceptably high I don?t doubt. But what encouragement is the insurer giving providers to lower costs? And what of Empire?s own administrative excesses? Is executive compensation anywhere near ?reasonable,? or are the company fat cats living easy while the Empire tries to jointly squeeze providers and customers. An increase of 18.4% imposed upon those who use the health exchange is unconscionably high, especially since customers using the exchange are most often those who do not have access to health insurance

elsewhere. Many, like me, rely on reduced premiums because we prove to be of modest income. This request for a usurious rate increase, if granted, will subvert the whole intent of the Affordable Care Act?to assure reasonable insurance rates for those most in need of them.

Empire is a vast insurance company with a myriad of plans?they should be held accountable for maintaining their plans on the health exchange at the most favorable consumer rates possible.

Any rate increase they request should not be granted before they open their books to a transparent investigation of their own internal fiscal practices. AE



Empire HealthChoice HMO, Inc.

individual

hmo



Re: Empire HealthChoice proposed rate increase of 18.3% for 2015. As a subscriber to Empire's Silver Guided Access care product, I fervently oppose this rate increase and I urge the DFS to deny the application. In this letter I will demonstrate that five of Empire's reasons for requesting a rate change are not borne out by facts or logic. I will then illustrate, using personal examples, how Empire operates inefficiently to a degree that raises their own costs while lowering the delivery and quality of care to this customer.

- 1. New pool of customers?:** First, although a larger pool of customers increases the company's liability, it is also true that it increases subscription revenue. Whether the rate of liability (per subscriber) will change is unknown at this time. In fact, that rate may well decrease with the entry of new types of customers via the HIX. Therefore, in the absence of data to support Empire's rationale on this point, the request for a rate increase is, at best, premature.
- 2. Changes to taxes, fees and the federal transitional reinsurance program?:** Taxes and fees are the costs that corporations incur for operating a profit-making enterprise in a country that provides the infrastructure (data, communications, transportation, etc.) they require. In most cases, these costs are reasonable. Individuals incur tax liabilities for living in a country with good engineering infrastructure, free public education, local first responders, and so forth. For corporations to pass these taxes and fees on to the consumer is contrary to the purpose and intent of these costs of doing business. Furthermore, regulatory fees go to fund the agencies that prevent these enterprises from abusing their customers; these agencies were created because some companies demonstrated that they could not be trusted to act responsibly without regulation.
- 3. The rising cost of medical care?:** Who is driving up the cost of medical care? Insurance companies make it impossible for doctors to practice medicine without having their own accounting departments to deal with the insurance companies. As long as healthcare is a for-profit enterprise, the cost will continue to rise in a game of one-upmanship between providers and insurers. The consumer is left with higher premiums and lower-quality care.
- 4. More benefits are available to more people?:** The availability of benefits does not equal the use of benefits. Period. (Also see New pool of customers, above.)
- 5. Cost-sharing changes?:** In their notice, Empire offered no specifics. For all we know, these changes constitute an increase in consumer contributions to these costs. This vague, ambiguous statement does not support Empire's request. I lost my group coverage when I lost my job in March 2014. Since 4/1/14 I have been covered by Empire through the NYS Health Exchange. My diagnosis is Major Depression, Severe, Recurrent, Treatment-Resistant. In the midst of dealing with job loss, managing my illness, and looking for a new job, I have had to fight the company for nearly every prescription or medical claim I have submitted in the 16 weeks during which I have been covered by Empire. In the 16 weeks that I have been with

Empire, I have been forced off of generic maintenance medications multiple times while prior authorization was sought. My doctor provided what Empire requested, Empire authorized the drugs for one year, and I was able to get the four medications. This month, Empire is again requesting authorization for three of those same medications. I cannot afford to pay in excess of \$1,000 out of pocket, so I am currently off of one of the drugs. I feel the effects of this rather acutely, but at least it isn't an outright withdrawal situation as it was with another medication they temporarily forced me off of. For me these instances constitute lost time when I could be (1) maintaining a stable state as I have been doing for the past several years on my current drug regimen and (2) searching for a job instead of battling the entity whose stated goal is to keep me healthy. In these 16 weeks, Empire has delayed processing claims for 50 days in some cases. With one of my providers they denied coverage for one reason, reversed their decision, paid, a handful of the claims, and are now denying coverage for a different reason. I have spent more than 45 hours advocating for myself, and my two providers have spent additional hours doing the same. Empire could easily lower its administrative costs by providing consistent, reasonable, reliable coverage. The dozens of hours I have spent on the phone with them is an unnecessary expense on their end. The time they spent responding to my complaint against them with the NYS Dept. of Health is an unnecessary expense, as will be the time they spend responding to my next complaint. In sum, if Empire wishes to widen its operating margin, they need look no further than their own wasteful policies and processes. Empire's rate increase request seeks to place a financial burden on the consumer to ameliorate problems of Empire's own creation. Empire HealthChoice has proved to be a bad actor in the health insurance marketplace, and under no circumstances should the DFS reward Empire's behavior by approving their request. Sincerely, [REDACTED]



Prior Approval Submission
NYS Department of Financial Services
To: PremiumRateIncreases

07/24/2014 03:22 PM

Empire HealthChoice HMO, Inc.

individual

other



My plan has denied coverage on almost every claim that has been submitted since January 2014. I had received confirmation of coverage prior to undergoing all medical appointments and, yet, the claims have been denied. I have been challenging those denials since March, and those claims are now "in review." I am told I will hear nothing prior to August 15. I am a former lawyer and I am aware that many people do not challenge their initial EOBs. If this type of behavior is happening to other customers, it seems to me that the company is actually achieving cost savings this year by not paying out legitimate claims. I find it difficult to support a rate increase when no payments are being provided.



Empire HealthChoice HMO, Inc.

individual

hmo



I have to say I am shocked that Empire Blue is asking for a rate increase. Their service is terrible, and their practice deceitful. They were completely unprepared to begin this program, and continue to be so. Finding a doctor is the first terrible thing in this experience. It involves going through their list and calling one by one each doctor to find out whether they were actually enrolled in BCBS plan and taking the insurance. Most of the time, they are not, with contracts unsigned by the insurance company by the provider. Then, the doctors will prescribe tests. Although the laboratory is clearly listed in their system, whether the tests are covered is arbitrary and there is no clear way of finding out. It takes a minimum of 40 minutes to get a person on the phone a delay which is endemic to their system. The fact of the huge laboratory bills I am now facing because of their arbitrary lab bill approval process makes me terrified to go to the doctor at all. Doctors prescribe tests. I can't pay more for one test than I do my premium for 6 months. Continuing, when my husband experienced a serious injury while out of state, we called and waited to speak with someone the entire 30 minutes on our way to the urgent care clinic without luck. Finally, we had to hang up because he needed treatment. I won't be surprised if they refuse to cover it. That seems to be what they do. And, in other irritating issues, I happened to go to the doctor on one of the days their system had a glitch. I was told my insurance was delinquent and that I'd have to sort it out with them. It was humiliating, I was treated

like a criminal, and the woman from the insurance company on the phone with the office refused to speak with me, although I had every single payment receipt with me. When I finally got through to someone (40-50 minutes of waiting) when I returned home, I was told it was a system wide glitch and everything was fine. While that's lovely, someone should have communicated to their provider services that the system was broken, rather than letting that fall on me, as a consumer. The point is their service is terrible, their goal is to deny as much coverage is possible, and I cannot believe they have the gall to ask for a 15.6% rate hike. I cannot wait to switch to another company that makes a point of covering the bare minimum. At least then I will know that the only thing my insurance is good for is being hit by a bus, rather than being lulled into the false idea of being able to visit a doctor when I need to.



Rate increase for blue cross

[REDACTED] to: premiumrateincreases

07/26/2014 12:58 PM

History:

This message has been replied to.

I am opposed to any rate increase because the insurance they offered was in many cases deceptive. Many of the hospitals they said were in there plan upon signing up for coverage are not. And many provideers who accept Blue Cross do NOT accept All the plans they offer This is sheer deception We are already paying for service we cannot get

--

[REDACTED]



Prior Approval Submission
NYS Department of Financial Services
To: PremiumRateIncreases

07/26/2014 05:25 PM

Empire HealthChoice HMO, Inc.

individual

hmo



The request for an increase in monthly payments of 18.4% is outrageous. I thought under the ACA the premium increases were limited to 8%? How is it possible with all the new enrollees that they need an increase of that size? This is an undue burden on all of us. How is this affordable? We are also stuck because this plan covers the hospitals in our vicinity. We can't switch to another plan because of this. This should not be approved!



Empire HealthChoice
HMO, Inc.
individual
hmo



I find the idea of an 18% increase completely ridiculous. The rates of the Silver Guided Access with HSA plan are much higher than my previous coverage with Empire Blue, and I get much less for them. Not to mention there is a huge amount of wastefulness in this plan. My understanding was that if administrative costs exceeded a certain percentage, then subscribers were due back money. I can point out several areas of administrative waste already. One, they send out extra letters every month if you pay your premium bill *on time.* Two, they send out nonsense/non-applicable letters that make no sense, and when you call to find out what's going on, they say to ignore the letter. Three, they decline routine care and cause you to have to appeal that claim, which

is a waste of time, money and resources. I have paid almost \$500 per month every month this year, and nearly every dollar for my health has come out of my own pocket in my HSA. What am I paying for? More administrative waste: at the beginning of the year, it took me literally two weeks to get through to someone to discuss a necessary procedure. The system would put me on hold for sometimes two hours before someone would pick up and promptly disconnect me. This happened over and over. I was crying from frustration and pain from needing the procedure. The first primary care physician they assigned me was retired. The second worked only out of a prison. You could excuse some of these issues as growing pains in a new ecosystem of health care, but the sense was they were doing this deliberately to try to undermine the ACA. The systems were all broken. The website is incomplete and not very useful; I couldn't even find out basic information about my plan. And it took them six months to even start processing my claims,

which left me ignorant of what my out-of-pocket costs were going to be (and they are very high, unfortunately). Now I'm dealing with a bill from a lab the plan says is out of network. The doctor's office says every Empire Blue plan has always covered this lab. The bill is around \$1500. The doctor's office says I should have found out which labs were covered from Empire Blue, but where? How? The information is not available on the Empire Blue site, and like I said, getting through by phone is next to impossible, especially when I was getting these tests. If anything, Empire Blue should be paying US for pain and suffering and reducing their rates a LOT next year. They are a poorly-run company and do not manage administrative costs well. If their rates increase, I will definitely be jumping ship. I wish there were better options for coverage in my area (lower Putnam, on the edge of Westchester). This is a hole I ask the NY Board to close up, giving Putnam residents more access to Westchester facilities and doctors.



comment on proposed premium rate change (Empire Blue Cross Blue Shield health insurance)

[REDACTED] to: premiumrateincreases

07/28/2014 01:55 PM

Cc: [REDACTED]

To whom it may concern,

with regard to the proposed premium rate change of Empire Blue Cross Blue Shield in the State of New York, we would like to comment as follows.

We have received written notice by Empire Blue Cross Blue Shield that we may expect a premium increase of 18.4% for the year 2015, if approved by the DFS.

We have individual coverage as a family and our insurance details are as follows:

Insurer: Empire HealthChoice HMO, Inc

Empire benefit plan: Empire Platinum Guided Access ceaf

HIOS identification number: [REDACTED]

We strongly disagree with an increase in premium payments and perceive it as not justified. The current monthly premium payment is already very high at USD 1,768.97 and we are still paying significant medical charges out of pocket (e.g. copays, recent hospital charge of USD 700 despite in-network coverage). In addition, the monthly premiums are taxable, which brings the actual monthly burden to USD 2000.00. I understand that minor rate adjustments become necessary over time, but an increase of 18.4% is exorbitant and not manageable for the consumer. In our case this comes down to an additional gross amount of almost USD 400 per month, totaling in a gross amount of almost USD 2400 per month for health insurance. We cannot afford this increase as a family.

Please take our concern into consideration when reviewing Empire's proposal for premium rate change for 2015. Thank you!

[REDACTED]



Complaint against premium increases

[REDACTED] to: premiumrateincreases

07/28/2014 02:58 PM

History:

This message has been replied to.

Hello,

I recently received a notice that health insurance premiums may increase next year by as much as 18.4%. The current rate of my individual plan is \$427.33- which is a substantial chunk of my income.

I simply cannot pay more for health insurance, and the coverage I have doesn't cover many of the medical expenses I currently have... please... help out the residents of New York and protect us from these *unreasonable* and *unaffordable* rate hikes.

With regards,

[REDACTED]



Comments Opposing Rate Change

██████████ to: premiumrateincreases

07/28/2014 03:40 PM

Dear NYS Dept of Financial Services:

I am an Empire Blue Cross Blue Shield customer. I arranged my insurance via the NY State Health Care website. I oppose Blue Cross Blue Shield's proposed rate hike because--given the high premium that the federal government and I pay for this insurance--I do not believe that Blue Cross can be losing money on these policies as they claim. Their payments to doctors are quite low and as a result, very few top doctors in New York city accept my plan... which is the Silver Guided Access...one of the more expensive plans.

I encourage you to carefully investigate Blue Cross' claims to be certain they have not diverted losses from other health insurance policies to exaggerate their claims.

Sincerely,

██████████

Empire Blue Cross Blue Shield Silver Guided Access Member



Empire HealthChoice
HMO, Inc.
individual
hmo



This is my HIOS:



I just received a letter from Empire BCBS informing me of this proposed increase in my insurance premium of 15.6% for 2015. I have to say I find this increase absolutely excessive, even attempting to take into account the (vague) explanation given by the insurance company. The reasons they offer, in this letter at least, are nothing but a laundry list of everything they can think of: "rising cost of medical care," "new pool of customers," "changes to taxes," and so on and so forth. I am sure that the Affordable Care Act was not meant to pass on the burden of all these costs onto the individual consumer--whether part of this "new pool of customers" or small business operators such

as myself--just so insurance companies can continue to increase their profits without addressing ANY of the reasons medical care costs are astronomically high here in the USA. It's NOT because we, the individuals striving to contribute to the economy while paying these premiums to prevent a financial disaster in the case of an emergency or serious illness, are really costing the insurance companies 15-16% more year over year. No, we're not the ones benefitting. But someone is. When I say that we are not benefitting, just take a look at the "Bronze" level plan I had to choose among my relatively limited choices here in NYC -- because the premiums associated with other plans were incredibly high, and the additional coverage did not appear to be much better unless I went all the way to "Platinum." On the plan I have, the deductible is \$4000 for an individual. This used to be considered a "high" deductible--catastrophic insurance. Now, it's practically the minimum. Okay, let's

look at what else I have to pay aside from the premium and deductible: 40% coinsurance. That's no small thing. I'm willing to bear that cost--obviously--for the other benefits of the ACA, namely, the coverage for basic preventive care and the lifting of the "lifetime maximum" limits, which were horrendous for anyone struck with a major illness or disability. I used to work for major firms and I was on their insurance. Back when coinsurance was something like 20% and the company subsidized the premium and so forth. I've been an independent consultant for the past 5 years; thus I have bought individual insurance pre-ACA, and now after ACA. Let me make clear the following: 1. I am in favor of the reforms made by the ACA. Some of them truly help the American people. 2. It's not enough; we should have a single-payer system; we are still at the mercy of these giant companies hell-bent on maintaining and increasing their profits (as companies do) 3. Just because I

moved from Chicago to NYC this year, I had to choose a different insurance plan (seeing as how everything is run at the state level, and company by company) and immediately experienced a giant price hike--with FEWER benefits than the plan I had selected in Illinois. So what exactly is governing the price-setting? Yes, yes, I know about the risk pool and this calculation vs that, but what are we doing to make sure individuals don't DROWN in costs that actually make no sense when you look at what people pay in other parts of the USA or, let us not forget, other first-world countries for the same or BETTER quality care? 3. Every year my insurance premiums have increased. Every single year. But NEVER have they increased by 15.6% in a single year. I expect the DFS to take a very hard look at what the insurance companies are proposing here. 4. I'm one of the fortunate ones who manages to make a good living running my own business, and I manage to live in the greatest city in the USA. If these

costs are a hefty percentage of MY income, what is happening to all those are who less fortunate, but don't qualify for government discounts? This is a BRONZE plan. Are you going to introduce "Wood" plans? "Paper" plans? Maybe our coinsurance will be jacked up to 50%? 60% God forbid the insurance companies should have to actually pay claims after collecting our premiums, right? Or perhaps we can start looking at the flat-out extortionist prices that the healthcare conglomerates are levying for every single aspirin, bandage, 10-minute visit, CT scan, and the like? Put the brakes on. If they can raise premiums by 16% this year, they'll know they can do it again and again. The system is broken. ACA does not go far enough. At least police it a LITTLE BIT. Thank you.



Prior Approval Submission
NYS Department of Financial Services
To: PremiumRateIncreases

07/28/2014 08:04 PM

Empire HealthChoice HMO,
Inc.
individual
hmo



One more thing, appended to my previous comment. I just noticed this letter the insurance company sent is dated June 16. Well guess what, they didn't bother to mail it until the end of July. What's that about? Further, I've had this plan for just 3 months. It's a pretty big blow to get a notice of increase right after I signed up, and have not even used the insurance yet. And they can stop whining about "dental" insurance, or "pediatric dental," because **THERE IS NO DENTAL COVERAGE** and I don't have kids, and I paid over \$500 recently for x-rays and cleaning. I'd like to know what "dental" coverage has to do with Empire raising my premium. Okay, that's it for now, I can't waste any more of my time on this absurdity. Not at the moment, anyway. Please do something.



Proposed 18% Rate Increase

[REDACTED] to: PremiumRateIncreases

07/29/2014 08:35 AM

I received a letter today from Empire BlueCross Blue Shield regarding their proposed 18% rate increase for 2015. I couldn't believe my eyes! Is there anything your office can do to prevent such a ridiculously high increase? I am on a fixed income and will have to drop this policy if their rates go up to that extent.

--

[REDACTED]



Empire HealthChoice
HMO, Inc.
individual
other



I just want to let it be heard that I don't feel this rate change is fair. Because of the Affordable Care act, my health insurance rate went up. I was forced to get a new, more expensive plan. And now learning that it's possible my rate could go up again, even more, is extremely disappointing and aggravating. I hope someone can help by declining this requested rate change. Thank you.



Prior Approval Submission
NYS Department of Financial Services

To: PremiumRateIncreases

07/30/2014 12:12 PM

Empire HealthChoice HMO, Inc.

individual

hmo



Proposed increase of 18.4% represents significant hardship in my case, since my income as a freelance artist did not go up 18.4%, and in fact in the last year, I have suffered a decrease in income. The point of the ACA was for the insurance companies to eliminate inefficiencies and waste in the system, not simply raise rates because more people are obliged to pay.



Empire BC BS - BS is right!

to: PremiumRateIncreases

07/31/2014 07:55 PM

Dear Sir or Madam:

I have **just** received a letter from Empire BlueCross BlueShield (dated June 18th) in which they state that they have filed with DFS for an increase in ObamaCare premiums which would result in my Empire Silver Guided Access Plan premiums to increase by **18.4%**.

This insurance company's arrogance and gaul seems to know no boundaries. After its complete and intentional inept roll out of the program – a program that it had years for which to plan – and after the State of New York smacked Empire's ass with “negotiated” premium refunds for customers, they still haven't gotten their administration of the program right, AND NOW THEY THINK THAT THEY ARE ENTITLED TO INCREASED PREMIUMS. NOT EVEN SIX MONTHS OF COVERAGE FOR MOST OBAMACARE CUSTOMERS, AND EMPIRE IS CRYING FOR AN 18.4% INCREASE. THERE MUST BE A SPECIAL PLACE IN HELL FOR INSURANCE COMPANY EXECUTIVES. PLEASE CHECK TO SEE WHETHER ANY OF THEM TOOK A HIT IN THE PERSONAL POCKET FOR THEIR POOR PLANNING AND ABSOLUTE FAILURE TO MEET THE BARE MINIMUM STANDARDS OF SERVICE TO THIS STATE'S MOST VULNERABLE GROUPS.

ANY INCREASE IN PREMIUMS GIVEN TO THESE CROOKS, AND I ASSURE YOU THAT I WILL WORK TO DEFEAT EVERY CURRENT POLITICIAN IN THIS STATE'S GOVERNMENT, STARTING WITH GOVERNOR CUOMO. Empire is trying to recover the “negotiated” fine that it had to in effect pay by giving back premiums. Empire never intended to offer coverage at the agreed upon premium rates. TheY ALWAYS intended on jacking them up immediately.

Empire wastes so much money, it is disgraceful even in a insurance industry that is known for waste. Every month I mail my premium via Priority Mail with receipt trace exactly 3 business days before the premium is due. It always arrives either one or two days PRIOR to the due date. And EVERY MONTH I receive a past due letter that is dated long after the date the Post Office confirms delivery. Empire sends a three page letter - THREE PAGES. Do you know what that costs to prepare, print, stuff, and mail? They are easily adding and unnecessary and very wasteful \$2.00 to the cost of every month's coverage.

Also, Empire inadvertently failed to include my physician on their roll of doctors and required him to fill out tons of paper work to be credentialed. However, he was perfectly credentialed by them previously for other Empire coverage that was not on ObamaCare. They accepted his claims from his patients on all of their other plans but BALKED on accepting ObamaCARE and made the physician jump through time consuming and needless hoops so that Empire could delay covering people.

Here is my CURRENT COMPLAINT which I ask that you investigate. All of sudden, out of the blue, Empire declined to pay for my prescription of Simvastatin and said that I was required to get the medicine by mail. ARE THEY KIDDING. I had to dole out the full price of the drug, because I have to take it. NOT DURING ANY PART OF THE APPLICATION PROCESS OR IMMEDIATELY AFTER COVERAGE WAS INSTITUTED, DID EMPIRE DISCLOSE THAT PATIENTS WERE REQUIRED TO USE SOME SLEEZY MAIL ORDER PHARMACY WHERE:

1. The patient has no ability to gage the cleanliness of the facility where the prescriptions are being filled.
2. The patient has no ability to gage the cleanliness and professionalism of the people who are filling the prescriptions.
3. The patient has no knowledge about where on God's earth these mail-order pharmacy's are getting their drugs. Most likely China where you can bet your last dollar you are getting contaminated drugs with sawdust and road paint and god knows what else.

I have a right to decide where I want to go to have my drugs prescriptions filled, and if I don't think that the professionalism of the pharmacist is what it should be, I have a right to go somewhere else.

The truth is that these mailorder pharmacies cut expenses by buy cheaper quality drugs created in unregulated drug factories in China or Pakistan, and they have no clue whatsoever what they are sending to their mailorder clients. Look at the millions of complaints on line. It is disgusting what these companies get away with. That is the only possible way that they can make money. And if sales in a month aren't what they should be, they cut back on supervision or hire a part time minimum wage high school drop-out to fill prescriptions. The only way that these companies can make money is by being secretive about their business, cutting corners, and hoping they don't get caught.

If Empire had disclosed that patients must use mailorder pharmacies, I WOULD NEVER HAVE SIGNED UP WITH THEM AND IF THAT IS THE CASE WITH ALL OF THE OBAMACARE PLANS, I WANT NOTHING TO DO WITH THEM. I probably only have 15 years of life left, and I'm not going to give any of them up because Empire wants me to take CUT RATE DANGEROUS DRUGS.

I want to know why the hell the State of New York is allowing these insurance companies to force people to take risky drugs. My current prescription which Empire refuses to pay for runs another 8 months. I can't transfer it (says my Rite Aid pharmacist) and I have to go back to my doctor to get a new prescription. That's another appointment, another co-pay, another deductible, and guess what, Empire won't cover that either.

But it's all beside the point, because I believe that my health would be in greater danger by taking mailorder drugs than if I don't take my drugs at all. AGAIN I want to point out that no disclosure was made by Empire to me at the time of application, selection of plan, or until they declined to cover my prescription that they were REQUIRING me to buy cheaprate drugs through a hokey mail pharmacy. I WILL NOT DO IT. I WILL NOT DO IT.

My apologies for the rant. I am 62. I am on a fixed income. I am of a group that insurance companies like Empire think that they can push around and who they wish would die early so they don't have to cover claims. Empire wants me to die ASAP, so that the executives' bonuses won't be adversely affect.

I meant what I said: Any increase in premiums and nobody gets re-elected.

Regards,

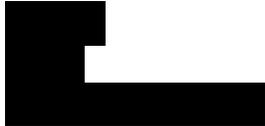
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Prior Approval Submission
NYS Department of Financial Services
To: PremiumRateIncreases

07/31/2014 07:59 PM

Empire HealthChoice HMO, Inc.
individual
other



Dear Sir or Madam: I have just received a letter from Empire BlueCross BlueShield (dated June 18th) in which they state that they have filed with DFS for an increase in ObamaCare premiums which would result in my Empire Silver Guided Access Plan premiums to increase by 18.4%. This insurance company's arrogance and gaul seems to know no boundaries. After its complete and intentional inept roll out of the program ? a program that it had years for which to plan ? and after the State of New York smacked Empire's ass with ?negotiated? premium refunds for customers, they still haven?t gotten their administration of the program right, AND NOW THEY THINK THAT THEY ARE ENTITLED TO INCREASED PREMIUMS. NOT EVEN SIX MONTHS OF COVERAGE FOR MOST OBAMACARE CUSTOMERS, AND EMPIRE IS CRYING FOR AN 18.4% INCREASE. THERE MUST BE A SPECIAL PLACE IN HELL FOR INSURANCE COMPANY EXECUTIVES. PLEASE CHECK TO SEE WHETHER ANY OF THEM TOOK A HIT IN THE PERSONAL POCKET FOR THEIR POOR PLANNING AND ABSOLUTE FAILURE TO MEET THE BARE MINIMUM STANDARDS OF SERVICE TO THIS STATE'S MOST VULNERABLE GROUPS. ANY INCREASE IN PREMIUMS GIVEN TO THESE CROOKS, AND I ASSURE YOU THAT I WILL

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Regards,

[REDACTED]



Re: Empire BC BS - BS is right!

[REDACTED] to: PremiumRateIncreases

07/31/2014 08:01 PM

My apologies, I forgot to include my special HIOS number which is [REDACTED]

Empire HealthChoice HMO, Inc.

Crooks, all of them.



Prior Approval Submission
NYS Department of Financial Services
To: PremiumRateIncreases

08/01/2014 11:48 AM

Empire HealthChoice HMO, Inc.

individual

hmo



I've been self-employed for 20+ years and was able to get insurance because I have one employee. In 2013 that policy cost \$554, an HMO and was accepted in most medical offices. Not fully aware, this current policy I obtained thru the NYS Health Exchange charges me \$620. 90% of the medical offices I've called to attempt to become a patient did not accept this current policy. To ask for an increase is ludicrous given practically no one accepts it. Please do not approve of this increase.



NO on Proposed Rate Increase

[REDACTED] to: premiumrateincreases

08/03/2014 05:28 PM

Hello,

It is totally ridiculous that Empire Blue wants to raise my health insurance rate at all. I already pay \$523 a month for health insurance. This is too much. I cannot afford a rate increase. Please block this.

Empire HealthChoice HMO, Empire Gold GuidedAccess, individual coverage,
[REDACTED]



Prior Approval Submission
NYS Department of Financial Services
To: PremiumRateIncreases

08/05/2014 12:24 PM

Empire HealthChoice
HMO, Inc.
individual
epo



I just received a notification that Empire Blue Cross/Blue Shield is requesting a -- get ready for this -- an 18.4% increase in my monthly premium for 2015. This is OUTRAGEOUS!!!!!! So much for Obama's affordable healthcare. This is what they call a "bait and switch" scam in unscrupulous retail stores. You are promised one item and they switch and offer you an item of much less quality -- for the higher price. The Insurance Exchange and Obama Promised me a plan for 438 dollars month just a few months ago in May 2014 -- NOT a plan for 519 dollars!!!! A price hike of over 80 dollars!!!! In a span of only 8 months of starting my new Obamacare health

plan. This is a real nightmare and will have me working to just barely survive and pay rent, food, and Obamacare medical insurance! New York State DFS-- do NOT allow Empire to gauge it's customers like this!!!!!! This is not what was promised to us, and amounts to nothing less than a scam and outrageous money grab by Empire Blue Cross. Why did Blue Cross even offer this plan under The NYS Obamacare exchange -- if they knew they couldn't really provide their plan coverage for the 438 per month in the first place?



Empire HealthChoice HMO, Inc.
 individual
 hmo



August 1, 2014 Benjamin M. Lawsky Superintendent of Financial Services One State Street New York, NY 10004 Mr. [REDACTED] Health Bureau New York State Insurance Department 25 Beaver Street New York, NY 10004 Re: Requested Rate Changes ? Empire HealthChoice HMO, Inc. ? Individual On-Exchange Dear Superintendent Lawsky and [REDACTED], Health Care for All New York (?HCFANY?) submits the following comments relating to the proposed average rate increase of 18.2% and 23.5% for its individual and small group market plans, respectively, filed by Empire HealthChoice HMO, Inc. and Empire HealthChoice Assurance, Inc. (collectively, ?Empire?) with the New York State Department of Financial Services (DFS) for the 2015 plan year. HCFANY is a coalition of more than 160 consumer and small business health advocacy organizations dedicated to securing affordable, comprehensive, and high-quality health care for all New York residents. HCFANY believes that a robust prior approval process is a vital consumer protection. Because Empire?s proposed increases, if adopted without modification, would place financial strain on New York?s consumers and small businesses, HCFANY urges DFS to review them carefully. To this end, we submit the following comments. I. The Affordable Care Act and New York?s Insurance Marketplace HCFANY urges DFS to consider the New York carriers? proposed rate adjustments in the context of the Affordable Care Act?s (ACA) downward pressure on health care costs. Specifically, DFS should assess the impact of the following four factors on individual and small group prices in 2015. 1. Research indicates that the health cost curve is bending. Lower overall healthcare costs should in turn drive lower premiums. The ACA includes several provisions designed to control spending, such as incentives for new healthcare payment and delivery methods (e.g. value-based payment vs. fee-for-service). For the past decade, data from across the payer spectrum indicates that the rate of health care costs increases is slowing down. This trajectory is likely to continue, as more ACA provisions are solidified. For example, Medicare spending is about \$1,000 lower per person than predicted in 2010. PricewaterhouseCoopers projects a medical cost trend of 6.8% in 2015, a slight uptick from the 6.5% predicted in 2014 and down from the 7.5% cost trend predicted in 2013. The 2014 Milliman Medical Index cites a 5.4% growth rate between 2014 and 2013, the lowest since the calculation began in 2012. In short, as described in the table below, annual increases in national health care spending have been under 10% for the past 12 years, and have dropped significantly over time. Average year-to-year percent increase in National Health Expenditures 2000 2001 2002 2003 2004 2005 2006 2007 2008 2009 2010 2011 2012 6.6% 8.4% 9.7% 8.6% 7.2% 6.8% 6.5% 6.3% 4.7% 3.8% 3.8%

3.6% 3.7% Source: National Health Expenditure Data National research indicates that health insurance premium rates should be consistent with these lower health care costs. While pre-ACA rate increases averaged 10%, the Congressional Budget Office predicts only a 3% rise in Marketplace premiums for 2015. And just last week, California announced an average increase in its Marketplace plans of just 4.2% for 2015. Additionally, the 2014 Trustee Annual Medicare Report predicts that Medicare premiums will hold steady in 2015. In New York, according to a newly released DFS survey of carriers, New York's insurance plans have been early adopters of many of the ACA-related and other state health care cost reforms initiatives, such as value-based purchasing and patient-centered medical homes. Other reports provide evidence that ACA and New York State delivery system reforms are indeed resulting in cost reductions amongst all payers. The carriers' rate filings should include adjustments in 2015 which reflect the bending of the health care cost curve and the cumulative efforts of New York's payment reforms. For example, New York's Medicaid Redesign Team initiatives, the State's new Delivery System Reform Incentive Payment Program (DSRIP) and State Health Innovation Plan (SHIP) all employ delivery and payment system reforms that further reduce health care costs for the entire delivery system. Despite likely savings that will be generated from these reforms, only one carrier (Excellus) took a downward adjustment to account for quality improvement and cost containment strategies. We urge the DFS to consider New York carriers' rate proposals in light of the impact of the ACA.

2. The 2015 risk pool is likely to be lower-cost than in 2014, according to the Congressional Budget Office (CBO) and American Academy of Actuaries. In general, the CBO predicts that the healthier risk pool in 2015 will lower premiums relative to 2014. There are three reasons why New York is particularly likely to experience this downward trend: (1) higher than expected enrollments should result in increased carrier bargaining power; (2) the sickest consumers were more likely to have enrolled in year one; and (3) pent-up demand is likely to be concentrated in year one when more uninsured enrolled. The first of the three reasons supporting this prediction is that New York carriers have experienced higher than expected enrollments, due to the remarkably successful launch of the NY State of Health Marketplace. In just the first nine months, over 1.2 million New Yorkers have enrolled in Qualified Health Plans and Medicaid Managed Care plans, 84% of whom were previously uninsured. This exceeds the State's three-year enrollment goal of 1.1 million enrolled by the end of 2016. Carriers can, and should, leverage this increased customer base to reduce provider and other costs, due to economies of scale and the related increase in bargaining power with health care providers. The second reason for a lower-cost risk pool in 2015 than in 2014 is that individuals with higher health care needs are more likely to have signed up during the first 2013-2014 open enrollment period. In 2015 and beyond, healthier individuals are more likely to enroll as the individual mandate penalty increases. Therefore, the 2015 risk pool is likely to be healthier than in 2014. The third reason is that pent-up demand for services from previously uninsured should be concentrated in 2014. In building their 2014 rates, carriers already captured generous pent-up demand adjustments. Indeed, the vast majority (84%) of the over 1.1 million NY State of Health enrollees were uninsured. Moving forward, there is no evidence that the 2015 enrollees are likely to have the same rates of uninsurance. Moreover, the 2015 new entrants likely postponed enrolling in coverage because they are healthier and are less likely to have significant pent-up demand. In short, there is no need for a second year of pent-up demand adjustments and in

fact, DFS should secure a downward adjustment from the carriers for the likely reduction of pent-up demand in 2015 versus 2014. As noted above, California's regulators leveraged their bargaining power to secure only an average 4.3% rate increase for its Marketplace products, with many consumers seeing price decreases. Accordingly, DFS should review the carriers' rate proposals with the assumption that the 2015 pool should present overall lower health risk to insurers than the 2014 pool and a commensurate downward adjustment for lower risk and small pent-up demand should be ascribed to all carriers.

3. New federal risk adjustment, reinsurance and risk corridor programs are designed to defray carrier rate increases related to increased risk and market uncertainty. The ACA provides new risk adjustment and reinsurance programs to address increased risk by insurers and to assure stable prices for consumers and small employers. The ACA's reinsurance payments, designed to reduce rate increases based on less healthy risk pools, are expected to result in premium decreases between 10 and 15%. Historically, New York's now expired risk adjustment program reduced prices by up to 30%. New York carriers are proposing reinsurance adjustments between 5.75% and 6.10 % on average for on- and off-Marketplace plans, which are inconsistent with these projections and the State's historical experience. Moreover, a review of the New York carrier filings indicates that the majority of carriers in the individual markets proposed no adjustments for the federal risk adjustment program. Finally, none of the carriers have adopted adjustments for the federal risk corridor program, which protects the carriers from unanticipated risk selection. On behalf of New York's consumers and small employers, DFS should ensure that fair adjustments attributable to the impact of the federal risk adjustment, reinsurance, and corridor mechanisms are applied to the carriers in its review.

4. The New York State carriers' rates should reflect a downward adjustment for a decrease in administrative costs. The NY State of Health Marketplace reduces administrative costs for carriers related to compensation of agents/brokers, enrollment and marketing costs. Only 6% of NY State of Health enrollees sought help from a broker/agent during the first open enrollment period, while 43% got help from other in-person assistants, and the remainder enrolled via the helpline and the website. Additionally, the individual mandate as well as marketing and outreach efforts by NY State of Health should reduce marketing expenses for carriers. Each carrier filing must be considered in the context of the above mentioned environmental factors. Our specific concerns about the Empire application are described below.

II. Specific Issues in Empire's Rate Application

HCFANY urges the DFS to consider all of the above factors when reviewing Empire's rates. We further encourage the DFS to consider the difficult launch Empire has had in the individual market. Empire's billing and enrollment issues have led in many cases to suppression of medical claims costs as enrollees, unable to use their coverage or improperly deemed to have lapsed coverage when they had fully paid, were denied or had to postpone health care. We commend DFS for its rapid action to address the consumer complaints about missing ID cards, late premium bills, and other issues. We note, however, that it appears that several problems continue to date. Additionally, Empire's Actuarial Memorandum and Exhibit 18 (the Index Rate and Plan Level Adjustment Worksheet) raise the following specific concerns.

A. Initial Index Rate

Empire's initial index rate of \$437.53 is the highest amongst all the individual market applications filed with DFS to sell Individual On-Marketplace products in 2015. This rate is nearly one-and-a-half times the average base rate (\$324) of all the other on-Marketplace carriers. Because Empire's base rate is so high, DFS should be

mindful that any approved percentage increase in its rates will have a disproportionate financial impact on its enrollees. DFS should consider closely the justification for using this relatively high initial index rate as it reviews the Empire application.

B. Annual Medical Trend In addition to a high initial index rate, Empire cites a two-year trend increase of 23.90% (11.3% per annum) for its Individual Marketplace plans and 25% (12.5% per annum) for its Small Group plans, which exceeds nearly all of its competition in the Individual market. This rate is nearly double the PricewaterhouseCoopers national estimate of 6.8%. Empire's Actuarial Memorandum explains that this trend is derived by normalizing historical benefit expense for changes in the underlying population and known cost drivers, and the result is projected forward using regression analysis. However, as described above, several factors will likely contribute to lower costs in 2015, including a healthier risk pool, delivery system reforms, and federal risk adjustment and reinsurance programs.

C. Network Resizing HCFANY urges DFS to carefully scrutinize Empire's rate application to determine if an adjustment was made to reflect its "resized" network. While Empire's Exhibit 18 for its Individual Marketplace plan indicates that there is a -17.6% difference in its provider network, this adjustment does not appear to be included in its proposed rate increases. Many carriers are using narrow networks for their Marketplace plans in order to control costs and offer lower premiums to members. A recent Milliman report indicates narrow networks can result in premium reductions of 5% to 20% when compared with broad network plans. However, Empire's rate filings do not appear to accompany its reduction of network size with concurrent savings to its customers. HCFANY therefore urges the DFS to carefully review Empire's application to ensure that cost savings related to its network adjustment are distributed to its customers.

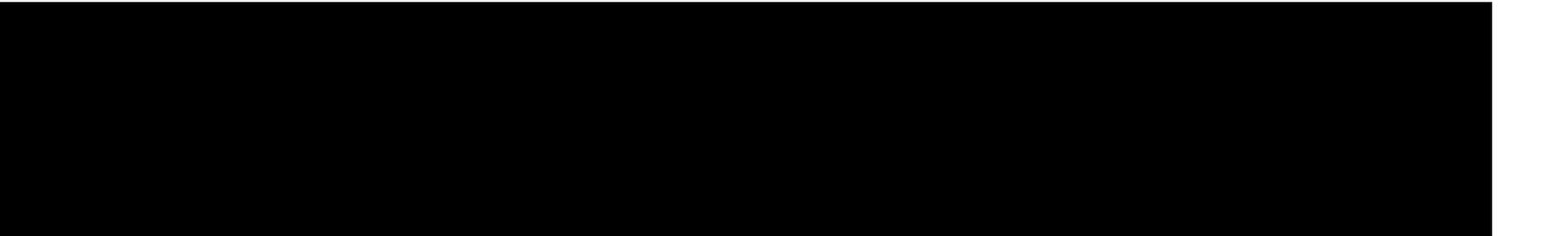
D. Increased Morbidity and Population Changes Empire indicates a 13.2% upward adjustment for changes to its risk pool. This line item appears to include an upward adjustment of 5.4% for increased morbidity. However, as described in detail above, experts have noted that the 2015 risk pool is likely to have lower morbidity than the 2014 pool, resulting in a lower-risk pool overall. Additionally, Empire explains its morbidity adjustment by saying that uninsured populations are more likely to have higher morbidity. Again, due to high enrollment of uninsured populations in 2014 (84%), it is likely that fewer of its 2015 enrollees will be uninsured. Since many will have been enrolled for the prior year, there should be no or a very low adjustment for pent-up demand. However, Empire does not indicate any other factors contributing to the 13.2% adjustment for risk pool changes. Accordingly, we urge the DFS to closely review Empire's application for full justification of this adjustment.

E. Administrative Costs Finally, Empire takes a 17% upward adjustment for administrative costs. As addressed above, carriers should be seeing reduced administrative costs as a result of aspects of the ACA that reduce marketing and enrollment costs. Additionally, in light of Empire's difficult launch described above, HCFANY urges the DFS to look closely at this significant increase in administrative costs to ensure Empire's customers do not bear the costs of any necessary improvements in its plan administration.

III. Conclusion HCFANY urges the Department to closely review Empire's application in light of the issues described above. Thank you for your kind attention to our concerns. If you have any questions, please contact [REDACTED] at [REDACTED] or at [REDACTED] or at [REDACTED] or at [REDACTED].

Very truly yours, [REDACTED] MPH
Legislative Counsel Health Policy Associate New Yorkers for Accessible Health Coverage

Community Service Society of New York cc:





Prior Approval Submission
NYS Department of Financial Services
To: PremiumRateIncreases

08/07/2014 07:47 AM

Empire HealthChoice HMO, Inc.
individual
hmo



Received a notice from Empire Blue about a NY premium increase of 18.4 %! That is outrageous. In such a low inflationary world this is way too much. I recently saw that some insurance companies in California were only asking for about 3%. What gives with Empire?



Prior Approval Submission
NYS Department of Financial Services
To: PremiumRateIncreases

08/07/2014 03:36 PM

Empire HealthChoice HMO, Inc.
individual
hmo



I received a letter saying that Empire BlueCross BlueShield is requesting a rate increase of 17%. I have never used the health insurance, keep it only for an emergency and have paid every month on time. It is an expensive peace of mind, and I can NOT afford to pay more. A rate increase means I'll need to leave the insurance and remain uninsured. Thank you for your consideration, [REDACTED] HIOS ID [REDACTED]





Empire BCBS's Proposed Rate Increase for Silver Level in State 's Health Plan Marketplace

to: premiumrateincreases

08/18/2014 09:55 PM

History:

This message has been replied to.

To Whom It May Concern;

I am writing to you because of the letter I received from my health insurance provider, Empire HealthChoice HMO, Inc. When I applied for health insurance coverage through New York's Health Plan Marketplace, I chose Empire BCBS for its stellar reputation and coverage. I opted for the Silver level of their plan, which brought my monthly premium to \$403.92.

A bit of background about myself: I am now a 29 year old female who is both active and fit, has no history of major illnesses, and has only fractured one bone. I am, what I'm sure the health insurance world would call, a keeper. I hold multiple photography jobs with various entities and make somewhere between \$25,000 and \$31,000 depending on how my year goes. \$403.92 a month is just shy of \$5k a year, but with a \$2,000 deductible in case something goes wrong, I figured it was better to put down \$5k over the course of the year than to choose a cheaper plan that had a larger deductible.

Since purchasing the Silver Plan with Empire BCBS (HealthChoice HMO), I have made every monthly payment on time. Despite that, I have received at least three late notices from Empire, one of which was dated three days prior to the actual due date of the monthly premium. I see these late notices as a waste of resources and of money. When I told Empire about the issue I was having, they told me that their system is set up to automatically send out late notices.

So when I received a letter informing me that Empire was looking to increase my monthly premium almost 20%, I was flabbergasted. There has to be another way to use my monthly premium more efficiently before they need to request I pay more money each month. A 20% increase will bring my monthly premium to approximately \$480 a month, making the yearly total they receive from me \$5,719 and change. That could potentially be one fifth of my yearly salary. Please do not allow Empire to raise my (and many others in this exact situation) monthly premium.

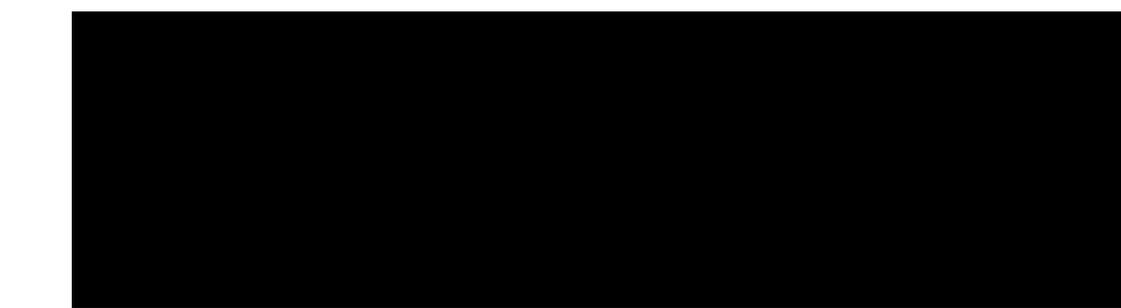
Name of My Insurer: Empire HealthChoice HMO, Inc.

Name of My Benefit Plan: Empire Silver Guided Access, cbnw

Coverage Type: Individual

My HIOS ID Number: [REDACTED]

Kind Regards,





Prior Approval Submission
NYS Department of Financial Services
To: PremiumRateIncreases

08/19/2014 06:50 PM

Empire HealthChoice HMO, Inc.

individual

hmo

[REDACTED]

Re: empire silver guided access cbnw HIOS # [REDACTED] They have some nerve asking for an increase. After Healthy NY closed my previous plan, which I had absolutely NO problem with I was forced to purchase a plan through the market place which is much more money out of my pocket with high deductibles and much higher copays plus premium payments! They have some nerve asking for a higher premium! Also MANY doctors who they have in network are NOT accepting this insurance. I cannot get radiologic testing in my borough of Staten Island and am forced to go into the city or Brooklyn! And trying to find a decent ophthalmologist is another project, none of the doctors my doctor or family and friends recommend are accepting this insurance even though they are shown to be IN NETWORK. It is just frustrating and now they have the nerve to ask for more money, by the way I am paying almost \$400 now. the insurance has NOT paid one cent since the copays and deductible are so high.. Thanks [REDACTED]

[REDACTED]



American Cancer Society ☞ Children's Defense Fund-New York ☞ Community Service Society of New York
Empire Justice Center ☞ Institute for Puerto Rican and Hispanic Elderly
Make the Road New York ☞ Medicare Rights Center
Metro New York Health Care for All Campaign ☞ New Yorkers for Accessible Health Coverage ☞
New York Immigration Coalition ☞ Project CHARGE
Public Policy and Education Fund of New York/Citizen Action of New York
Raising Women's Voices-New York ☞ Schuyler Center for Analysis and Advocacy ☞ Small Business Majority

August 1, 2014

Benjamin M. Lawsky
Superintendent of Financial Services
One State Street
New York, NY 10004

Mr. Charles Lovejoy
Health Bureau
New York State Insurance Department
25 Beaver Street
New York, NY 10004

Re: Requested Rate Changes – Empire HealthChoice HMO, Inc. – Individual On-Exchange

Dear Superintendent Lawsky and Mr. Lovejoy,

Health Care for All New York (“HCFANY”) submits the following comments relating to the proposed average rate increase of 18.2% and 23.5% for its individual and small group market plans, respectively, filed by Empire HealthChoice HMO, Inc. and Empire HealthChoice Assurance, Inc. (collectively, “Empire”) with the New York State Department of Financial Services (DFS) for the 2015 plan year.¹ HCFANY is a coalition of more than 160 consumer and small business health advocacy organizations dedicated to securing affordable, comprehensive, and high-quality health care for all New York residents. HCFANY believes that a robust prior approval process is a vital consumer protection. Because Empire’s proposed

¹ These rate increase applications were submitted on or about July 2, 2014. Specific references refer to SERFF file number: AWLP-129582419 (hereafter “Rate Application”).

Health Care For All New York
c/o Amanda Peden, Community Service Society of New York
105 E. 22nd Street, New York, New York 10010
(212) 614-5541



increases, if adopted without modification, would place financial strain on New York's consumers and small businesses, HCFANY urges DFS to review them carefully. To this end, we submit the following comments.

I. The Affordable Care Act and New York's Insurance Marketplace

HCFANY urges DFS to consider the New York carriers' proposed rate adjustments in the context of the Affordable Care Act's (ACA) downward pressure on health care costs. Specifically, DFS should assess the impact of the following four factors on individual and small group prices in 2015.

I. Research indicates that the health cost curve is bending.

Lower overall healthcare costs should in turn drive lower premiums. The ACA includes several provisions designed to control spending, such as incentives for new healthcare payment and delivery methods (e.g. value-based payment vs. fee-for-service). For the past decade, data from across the payer spectrum indicates that the rate of health care costs increases is slowing down. This trajectory is likely to continue, as more ACA provisions are solidified.² For example, Medicare spending is about \$1,000 lower per person than predicted in 2010.³ PricewaterhouseCoopers projects a medical cost trend of 6.8% in 2015, a slight uptick from the 6.5% predicted in 2014 and down from the 7.5% cost trend predicted in 2013.⁴ The 2014 Milliman Medical Index cites a 5.4% growth rate between 2014 and 2013, the lowest since the calculation began in 2012.⁵ In short, as described in the table below, annual increases in national health care spending have been under 10% for the past 12 years, and have dropped significantly over time.

Average year-to-year percent increase in National Health Expenditures

2000	2001	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012
6.6%	8.4%	9.7%	8.6%	7.2%	6.8%	6.5%	6.3%	4.7%	3.8%	3.8%	3.6%	3.7%

Source: *National Health Expenditure Data*⁶

² Blumenthal, D., Stremikis, K., & Cutler, D. (2013). Health care spending – a giant slain or sleeping? *New England Journal of Medicine*, 369(26), at 2551-2557.

³ The mystery of the missing \$1,000 per person: can Medicare's spending slowdown continue?. Kaiser Family Foundation, available at <http://kff.org/health-costs/perspective/the-mystery-of-the-missing-1000-per-person-can-medicare-s-spending-slowdown-continue/>.

⁴ Medical Cost Trend: Behind the numbers 2015, PricewaterhouseCoopers, available at <http://pwchealth.com/cgi-local/register.cgi/reg/pwc-hri-medical-cost-trend-2015.pdf>, at 6.

⁵ 2014 Milliman Medical Index, Milliman, available at <http://www.milliman.com/insight/Periodicals/mmi/2014-Milliman-Medical-Index/>.

⁶ Available at <http://www.cms.gov/Research-Statistics-Data-and-Systems/Statistics-Trends-and-Reports/NationalHealthExpendData/Downloads/tables.pdf>.



National research indicates that health insurance premium rates should be consistent with these lower health care costs. While pre-ACA rate increases averaged 10%,⁷ the Congressional Budget Office predicts only a 3% rise in Marketplace premiums for 2015.⁸ And just last week, California announced an average increase in its Marketplace plans of just 4.2% for 2015.⁹ Additionally, the 2014 Trustee Annual Medicare Report predicts that Medicare premiums will hold steady in 2015.¹⁰

In New York, according to a newly released DFS survey of carriers, New York's insurance plans have been early adopters of many of the ACA-related and other state health care cost reforms initiatives, such as value-based purchasing and patient-centered medical homes.¹¹ Other reports provide evidence that ACA and New York State delivery system reforms are indeed resulting in cost reductions amongst all payers.¹²

The carriers' rate filings should include adjustments in 2015 which reflect the bending of the health care cost curve and the cumulative efforts of New York's payment reforms. For example, New York's Medicaid Redesign Team initiatives, the State's new Delivery System Reform Incentive Payment Program (DSRIP) and State Health Innovation Plan (SHIP) all employ delivery and payment system reforms that further reduce health care costs for the entire delivery system. Despite likely savings that will be generated from these reforms, only one carrier (Excellus) took a downward adjustment to account for quality improvement and cost containment strategies.¹³ We urge the DFS to consider New York carriers' rate proposals in light of the impact of the ACA.

⁷ Gruber, J. (June 2014). Growth and variability in health plan premiums in the individual insurance market before the Affordable Care Act. *The Commonwealth Fund*, 1750(7), at 2.

⁸ Updated estimates of the effects of the insurance coverage provisions of the Affordable Care Act, April 2014. Congressional Budget Office, at 6.

⁹ Covered California Press Release, July 31, 2014. Available at <http://news.coveredca.com/2014/07/covered-california-announces-rates-for.html>.

¹⁰ 2014 Annual Report of the Board of Trustees of the Federal Hospital Insurance and Federal Supplementary Medical Insurance Trust Funds. (July 28, 2014). Available at <http://apps.washingtonpost.com/g/page/national/2014-medicare-report/1220/#text/p93>, at 87.

¹¹ A number of plans have accrued health reform savings. New York State Department of Financial Services. (July 2014). New York health care cost and quality initiatives. Available at: <http://www.dfs.ny.gov/report/00/payment-reform-report.pdf>. For example, United Healthcare's "Accountable Care Shared Savings" program saved over \$200,000 due to decreased inpatient and emergency room utilization; HealthNow's "Facility Quality Incentive Program" saved over \$3 million; and Excellus' "Rochester Medical Home Initiative" reported a 1.2:1 return on investment).

¹² See, e.g. Silow-Carroll, S & Edwards, J.N. (2013). Early adopters of the Accountable Care Model. *Commonwealth Fund*, pp. 19-20; U.S. Dept. of Health and Human Services., Press Release: Medicare's delivery system reform initiatives achieve significant savings and quality improvements— off to a strong start, (Jan. 30, 2014). Available at <http://www.hhs.gov/news/press/2014pres/01/20140130a.html>.

¹³ Excellus Health Plan, Inc., Exhibit 18, Line 17.



2. The 2015 risk pool is likely to be lower-cost than in 2014, according to the Congressional Budget Office (CBO) and American Academy of Actuaries.¹⁴

In general, the CBO predicts that the healthier risk pool in 2015 will lower premiums relative to 2014.¹⁵ There are three reasons why New York is particularly likely to experience this downward trend: (1) higher than expected enrollments should result in increased carrier bargaining power; (2) the sickest consumers were more likely to have enrolled in year one; and (3) pent-up demand is likely to be concentrated in year one when more uninsured enrolled.

The first of the three reasons supporting this prediction is that New York carriers have experienced higher than expected enrollments, due to the remarkably successful launch of the NY State of Health Marketplace. In just the first nine months, over 1.2 million New Yorkers have enrolled in Qualified Health Plans and Medicaid Managed Care plans, 84% of whom were previously uninsured.¹⁶ This exceeds the State's *three-year* enrollment goal of 1.1 million enrolled by the end of 2016. Carriers can, and should, leverage this increased customer base to reduce provider and other costs, due to economies of scale and the related increase in bargaining power with health care providers.

The second reason for a lower-cost risk pool in 2015 than in 2014 is that individuals with higher health care needs are more likely to have signed up during the first 2013-2014 open enrollment period.¹⁷ In 2015 and beyond, healthier individuals are more likely to enroll as the individual mandate penalty increases. Therefore, the 2015 risk pool is likely to be healthier than in 2014.

The third reason is that pent-up demand for services from previously uninsured should be concentrated in 2014. In building their 2014 rates, carriers already captured generous pent-up demand adjustments. Indeed, the vast majority (84%) of the over 1.1 million NY State of Health enrollees were uninsured. Moving forward, there is no evidence that the 2015 enrollees are likely to have the same rates of uninsurance. Moreover, the 2015 new entrants likely postponed enrolling in coverage because they are healthier and are less likely to have significant pent-up demand. In short, there is no need for a second year of pent-up demand adjustments and in fact, DFS should secure a

¹⁴ See, Updated estimates of the effects of the insurance coverage provisions of the Affordable Care Act, April 2014. Congressional Budget Office. p. 7; Drivers of 2015 Health Insurance Premium Changes. (2014). American Academy of Actuaries, at 2.

¹⁵ Updated estimates of the effects of the insurance coverage provisions of the Affordable Care Act, April 2014. Congressional Budget Office, at 7.

¹⁶ NY State of Health Public Marketplace Data Report as of June 30, 2014.

¹⁷ See, Updated estimates of the effects of the insurance coverage provisions of the Affordable Care Act, April 2014. Congressional Budget Office. p. 7; Drivers of 2015 Health Insurance Premium Changes. (2014). American Academy of Actuaries, at 2.



downward adjustment from the carriers for the likely reduction of pent-up demand in 2015 versus 2014.

As noted above, California's regulators leveraged their bargaining power to secure only an average 4.3% rate increase for its Marketplace products, with many consumers seeing price decreases.¹⁸ Accordingly, DFS should review the carriers' rate proposals with the assumption that the 2015 pool should present overall *lower* health risk to insurers than the 2014 pool and a commensurate downward adjustment for lower risk and small pent-up demand should be ascribed to all carriers.

3. New federal risk adjustment, reinsurance and risk corridor programs are designed to defray carrier rate increases related to increased risk and market uncertainty.

The ACA provides new risk adjustment and reinsurance programs to address increased risk by insurers and to assure stable prices for consumers and small employers. The ACA's reinsurance payments, designed to reduce rate increases based on less healthy risk pools, are expected to result in premium decreases between 10 and 15%.¹⁹ Historically, New York's now expired risk adjustment program reduced prices by up to 30%.²⁰ New York carriers are proposing reinsurance adjustments between 5.75% and 6.10 % on average for on- and off-Marketplace plans, which are inconsistent with these projections and the State's historical experience. Moreover, a review of the New York carrier filings indicates that the majority of carriers in the individual markets proposed no adjustments for the federal risk adjustment program. Finally, none of the carriers have adopted adjustments for the federal risk corridor program, which protects the carriers from unanticipated risk selection. On behalf of New York's consumers and small employers, DFS should ensure that fair adjustments attributable to the impact of the federal risk adjustment, reinsurance, and corridor mechanisms are applied to the carriers in its review.

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The NY State of Health Marketplace reduces administrative costs for carriers related to compensation of agents/brokers, enrollment and marketing costs. Only 6% of NY State of Health enrollees sought help from a broker/agent during the first open enrollment period, while 43% got

¹⁸ *Id.* n. 9.

¹⁹ Establishment of Exchanges and Qualified Health Plans, Exchange standards for employers (CMS-9989-FWP) and standards related to reinsurance, risk corridors, and risk regulatory impact analysis, Center for Consumer Information & Insurance Oversight, Adjustment (CMS-9975-F). (March, 2012). Center for Consumer Information & Insurance Oversight, U.S. Dept. of Health & Human Services, at 42.

²⁰ *Id.* at 43.



help from other in-person assistors, and the remainder enrolled via the helpline and the website.²¹ Additionally, the individual mandate as well as marketing and outreach efforts by NY State of Health should reduce marketing expenses for carriers.

Each carrier filing must be considered in the context of the above mentioned environmental factors. Our specific concerns about the Empire application are described below.

II. Specific Issues in Empire's Rate Application

HCFANY urges the DFS to consider all of the above factors when reviewing Empire's rates. We further encourage the DFS to consider the difficult launch Empire has had in the individual market. Empire's billing and enrollment issues have led in many cases to suppression of medical claims costs as enrollees, unable to use their coverage or improperly deemed to have lapsed coverage when they had fully paid, were denied or had to postpone health care. We commend DFS for its rapid action to address the consumer complaints about missing ID cards, late premium bills, and other issues.²² We note, however, that it appears that several problems continue to date.²³ Additionally, Empire's Actuarial Memorandum and Exhibit 18 (the Index Rate and Plan Level Adjustment Worksheet) raise the following specific concerns.

A. Initial Index Rate

Empire's initial index rate of \$437.53 is the highest amongst all the individual market applications filed with DFS to sell Individual On-Marketplace products in 2015. This rate is nearly one-and-a-half times the average base rate (\$324) of all the other on-Marketplace carriers. Because Empire's base rate is so high, DFS should be mindful that any approved percentage increase in its rates will have a disproportionate financial impact on its enrollees. DFS should consider closely the justification for using this relatively high initial index rate as it reviews the Empire application.

B. Annual Medical Trend

In addition to a high initial index rate, Empire cites a two-year trend increase of 23.90% (11.3% per annum) for its Individual Marketplace plans and 25% (12.5% per annum) for its Small Group plans, which exceeds nearly all of its competition in the Individual market. This rate is nearly double the PricewaterhouseCoopers national estimate of 6.8%.²⁴

²¹ 2014 Open Enrollment Report. (June 2014). NY State of Health: The Official Health Plan Marketplace, at 16.

²² See, Department of Financial Services. (February 10, 2014). Press Release: Governor Cuomo Announces Thousands of Empire Blue Cross Blue Shield Consumers will Receive Three Weeks of Coverage. Available at: <http://www.dfs.ny.gov/about/press2014/pr1402101.htm>.

²³ <http://www.yelp.com/biz/empire-bluecross-blue-shield-new-york>.

²⁴ Medical Cost Trend: Behind the Numbers 2015, PricewaterhouseCoopers, available at [see next page]



Empire's Actuarial Memorandum explains that this trend is derived by "normalizing historical benefit expense for changes in the underlying population and known cost drivers, and the result is projected forward using regression analysis."²⁵ However, as described above, several factors will likely contribute to lower costs in 2015, including a healthier risk pool, delivery system reforms, and federal risk adjustment and reinsurance programs.

C. *Network Resizing*

HCFANY urges DFS to carefully scrutinize Empire's rate application to determine if an adjustment was made to reflect its "resized" network. While Empire's Exhibit 18 for its Individual Marketplace plan indicates that there is a -17.6% difference in its provider network, this adjustment does not appear to be included in its proposed rate increases.²⁶ Many carriers are using narrow networks for their Marketplace plans in order to control costs and offer lower premiums to members. A recent Milliman report indicates narrow networks can result in premium reductions of 5% to 20% when compared with broad network plans.²⁷ However, Empire's rate filings do not appear to accompany its reduction of network size with concurrent savings to its customers.²⁸ HCFANY therefore urges the DFS to carefully review Empire's application to ensure that cost savings related to its network adjustment are distributed to its customers.

D. *Increased Morbidity and Population Changes*

Empire indicates a 13.2% upward adjustment for changes to its risk pool.²⁹ This line item appears to include an upward adjustment of 5.4% for increased morbidity.³⁰ However, as

<http://pwchealth.com/cgi-local/register.cgi/res/pwchealth-medical-cost-trend-2015.pdf>, at 6.

²⁵ Actuarial Memorandum, at 7.

²⁶ Empire's filings appear to indicate that no rate adjustment was made for its reduced network. Exhibit 18, line 14: Market wide adjustment for changes in provider network is accompanied by a footnote reading "not included in Empire's Claim Trend Analysis" and there is no other indication that the adjustment was made in the Exhibit 18 rate calculation. While Empire's Actuarial Memo states that it accounted for provider network changes in Exhibit P, this Exhibit makes no adjustment for provider network changes in any plan. For these reasons, it appears that Empire took no downward adjustment for provider network in calculating its rates.

²⁷ High-value Health Care Provider Networks. (July 1, 2014). Milliman, available at <http://www.ahip.org/MillimanReportPN2014/>, at 1.

²⁸ Media reports indicate that network size is a concern to consumers purchasing plans on the New York State of Health's Individual Marketplaces. See, e.g. In New York, hard choices on Health Exchange spell success. (April 13, 2014). NY Times; More insured, but the choices are narrowing. (May 22, 2014). NY Times; Obamacare: Anger over narrow networks. (July 22, 2014). Politico. That said, a recent Commonwealth Survey shows that when faced with a decision between a network size and affordability, many chose the latter. Collins, S., Rasmussen, P., & Doty M. (July 2014). Gaining ground: Americans' health insurance coverage and access to care after the Affordable Care Act's First Open Enrollment Period. Commonwealth Fund, at 15.

²⁹ Exhibit 18, line 18.

³⁰ Actuarial memorandum, Exhibit D.



described in detail above, experts have noted that the 2015 risk pool is likely to have *lower* morbidity than the 2014 pool, resulting in a lower-risk pool overall. Additionally, Empire explains its morbidity adjustment by saying that uninsured populations are more likely to have higher morbidity.³¹ Again, due to high enrollment of uninsured populations in 2014 (84%), it is likely that fewer of its 2015 enrollees will be uninsured. Since many will have been enrolled for the prior year, there should be no or a very low adjustment for pent-up demand. However, Empire does not indicate any other factors contributing to the 13.2% adjustment for risk pool changes. Accordingly, we urge the DFS to closely review Empire's application for full justification of this adjustment.

E. *Administrative Costs*

Finally, Empire takes a 17% upward adjustment for administrative costs.³² As addressed above, carriers should be seeing reduced administrative costs as a result of aspects of the ACA that reduce marketing and enrollment costs. Additionally, in light of Empire's difficult launch described above, HCFANY urges the DFS to look closely at this significant increase in administrative costs to ensure Empire's customers do not bear the costs of any necessary improvements in its plan administration.

III. Conclusion

HCFANY urges the Department to closely review Empire's application in light of the issues described above. Thank you for your kind attention to our concerns. If you have any questions, please contact Mark Scherzer at mark.scherzer@verizon.net or at (212) 406-9606 or Amanda Peden at apeden@cssny.org or at (212) 614-5541.

Very truly yours,

Mark Scherzer, JD
Legislative Counsel
New Yorkers for Accessible Health Coverage

Amanda Peden, MPH
Health Policy Associate
Community Service Society of New York

cc: Troy Oechsner
John Powell

³¹ Actuarial memorandum, at 7.

³² Exhibit 18, line 36.

105 East 22nd Street
New York, NY 10010

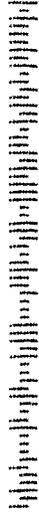
**Community
Service
Society** | Fighting Poverty
Strengthening
New York

PERMIT NO. 1000
NY 100
POSTAGE WILL BE PAID BY ADDRESSEE



Mr. Charles Lovejoy
Health Bureau
New York State Insurance Department
25 Beaver Street
New York, NY 10004

1000425859



RECEIVED

JUL 28 2014

7/20/14

HEALTH BUREAU
N.Y.C. OFFICE

To Whom It May Concern:

I recently received a notice from BC/BS stating that they are applying for a 10.8% increase in my premium for 2015.

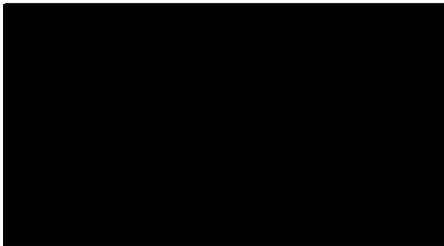
I have been a member of BC/BS for over 25 years and was generally satisfied. However, in January of this year, with the implementation of Obamacare, my plan was discontinued and I was automatically placed in another. The new plan costs about the same as my previous one, but leaves a lot to be desired – with high co-payments, deductibles and co-insurance.

At the present time I am unemployed and barely able to pay my current Insurance rates (being ineligible for financial assistance, as my wife's income is just slightly above the eligibility limit).

I realize medical costs are high, but this increase is going to put a great strain on myself, and I believe, many others. Therefore, please take the burden being placed on myself and many others into full consideration before allowing this increase.

Thank you.

Benefit Plan – Empire Essential Guided Access (individual coverage)
HIOS 80519NY0160132-00



RECEIVED

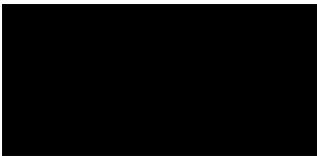
JUL 22 2014

HEALTH BUREAU
N.Y.C. OFFICE

July 15th 2014

NYS Department of Financial Services

Health Bureau-Premium Rate Adjustment



Re: Comment re Rate Increase by Empire Health Choice of 18 %

Health Insurance: Empire HealthChoice HMO

Empire Benefit Plan:

Individual Coverage

HIOS: 80519NY0160132

I want to protest this 18.4 % rate increase proposed by Empire HealthChoice. I am an independent real estate contractor who has to pay for my own health insurance. I have contracted this insurance less than a year ago on the NYS Health Insurance Market and was led to believe that this was an affordable individual basic, no frills coverage. With this increase my monthly rate will rise to \$ 510.00!

Empire claims that rising medical costs and a new pool of customers justify such an increase. In fact, national news have reported an overall decrease in the rise of medical costs across the US and the basic economic laws tell you that an increase in customers to your product allows you to lower the costs.

I therefore protest vehemently to such a cost increase.



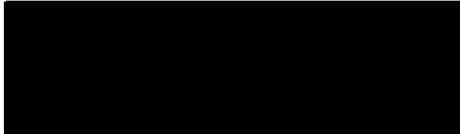
July 18, 2014

From:



To: NYS Department of Financial Services

Health Bureau – Premium Rate Adjustments



Re: Insurer Name - Empire Health Choice HMO, Inc.

Empire Benefit Plan - Platinum

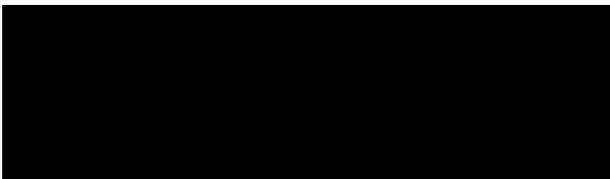
Individual Coverage

HIOS ID# 80519NY0160136

Empire Blue Cross Blue Shield notified me of a proposed premium rate change submitted to the NYS Department of Financial Services for its consideration. The rate change would involve an 18.4% increase to my already expensive monthly premium of \$681.63. The list of reasons for the proposed increase, included in their notification, did absolutely nothing to diminish my stress, frustration, total disappointment perpetrated by the farcical notion of “affordable care”. The concerns of Blue Cross Blue Shield focus on the increased costs to provide coverage for many services that don’t apply to a 62-year old widow (me), such as pediatric dental benefits.

Although I understand the insurance industry has been subjected to “taxes, fees, and requirements imposed by the transitional reinsurance program”, I also recall the hearty enthusiasm expressed by the industry for the Affordable Care Act. It truly believed that, if it lost money, the government bailout (i.e., the taxpayer bailout) would resolve its problems. Now I discover that I am the one contributing to off-setting costs and paying exorbitant premiums so that more (free) benefits can be available to more people (those already receiving welfare, falsely claiming disability, and establishing eligibility for Medicaid). Despite what Mr. Harry Reid may spout in the empty halls of Congress about “all these stories being told are lies”, I am one of the millions of taxpayers to whom lies were told.

I appreciate your taking the time to hear my concerns and I urge that the request to allow an 18.4% increase in monthly premiums be denied.



RECEIVED

JUL 23 2014

HEALTH BUREAU
N.Y.C. OFFICE

7-10-14

Please don't approve the
attached request. It is so
expensive already and so
much is not covered.

Please

Think of us..



Thank you

Please confirm that you received
this





KEEP THIS PORTION FOR YOUR RECORDS



BILL DATE: 06/25/2014

RECEIVED
JUL 15 2014
HEALTH BUREAU
N.Y.C. OFFICE
PAGE NUMBER: 1 OF 4

BILLING SUMMARY

CURRENT DUE DATE:	08/01/2014
CURRENT CHARGES:	\$1,477.90
BALANCE FORWARD AMOUNT:	\$0.00
SUBSIDY AMOUNTS:	\$0.00
AMOUNT DUE (YOU OWE):	\$1,477.90
<i>(See SUMMARY OF THIS BILL for more explanation)</i>	
PAYS FROM:	08/01/2014
PAYS TO:	09/01/2014

Cancel!

Important: This bill may include more than one month of premiums, which will be indicated by the dates in the Payment From and To fields in the Billing Summary section. If you have already mailed the premium for part of the time period referenced on this bill, please subtract that amount from the total on this bill and submit payment for the remaining premium amount by the due date on this bill.

YOU CAN NOW MAKE YOUR PAYMENT ONLINE! Visit us at empireblue.com. We also offer payments through our automated phone system or you can sign up for our automatic premium payment deduction option.

Notice of Cancellation: Please make your payment within 31 days of the premium due date. Your failure to do so will result in retroactive termination of your policy due to the nonpayment of premium. Your coverage will terminate on the date through which your premiums are paid. If you have any questions please call Member Services at the number on the back of your ID card between 7:00 a.m. and 7:00 p.m. Monday through Friday Eastern Standard Time. Our apologies if you have already mailed your payment to us. Thank you and please disregard this notice.

Helpful Hints regarding your bill are available by selecting the FAQs link on www.empireblue.com.

7-8-14
Please cancel this plan! I cannot afford a plan that does not accept any on my current doctors & medicine! Plus a possible 18.5 percent increase.

Services provided by Empire HealthChoice HMO, Inc. and/or Empire HealthChoice Assurance, Inc., licensees of the Blue Cross and Blue Shield Association, an association of independent Blue Cross and Blue Shield plans.

J. Cen

RETURN THIS PORTION WITH PAYMENT

Check your account online, make a payment or turn off paper statement at www.empireblue.com.



DUE DATE:	08/01/2014
AMOUNT DUE:	\$1,477.90

ID#: [REDACTED]
NAME: [REDACTED]

Amount Enclosed \$ **Cancel**

CONTRACT CODE: 0SWQ
BILL DATE: 06/25/2014
PAYS FROM: 08/01/2014
PAYS TO: 09/01/2014

PLEASE MAKE CHECK PAYABLE TO Empire BlueCross BlueShield
WRITE YOUR ID# ON YOUR CHECK AND REMIT TO:

EMPIRE BLUECROSS BLUESHIELD

CHECK HERE AND SEE REVERSE FOR ADDRESS CORRECTION:

1300142

RECEIVED

JUL 15 2014

HEALTH BUREAU
N.Y.C. OFFICE

JULY 8, 2014

NYS DEPT OF FINANCIAL SERVICES

HEALTH BUREAU - PREMIUM RATE ADJUSTMENTS

RE:

EMPIRE HEALTH CHOICE

~~FROM~~ HMO, INC.

INDIVIDUAL COVERAGE

ESSENTIAL GUIDED ACCESS W/ CHILD DENTAL cdce

HIOS [REDACTED]

PLEASE DO NOT APPROVE THE REQUESTED 10.8%
RATE INCREASE FOR 2015.

MY WIFE AND I CURRENTLY PAY \$841.02 PER MONTH.

WE HAVE NO CHILDREN, DUE TO THE HIGH COST OF
LIVING IN NY, I WAS DOWNSIZED FROM MY EMPLOYER

OF 19 YRS. I SECURED A DIFFERENT POSITION AT APPROX

50% OF MY OLD SALARY. EMPIRE TERMINATED OUR

HOSPITAL PLAN WHICH INCREASED OUR PREMIUM ALMOST

\$500.00 PER MONTH. THEY ARE SEEKING AN INCREASE

ONLY 6 MONTHS AFTER OBAMA CARE BEGAN.

WHERE DOES IT STOP? NY CONTINUES TO DRIVE OUT

LONG-TERM TAXPAYING CITIZENS AND PARTLY THIS IS

CAUSED BY PAYING FOR ILLEGALS AND THOSE WHO CHOOSE

NOT TO WORK. PLEASE, DO NOT APPROVE THE HIKE.

THANK YOU

RESPECTFULLY,
[REDACTED]



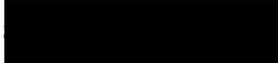
RECEIVED

JUL 09 2014

HEALTH BUREAU
N.Y.C. OFFICE

NYS Department of Financial Services
Health Bureau – Premium Rate Adjustments



Re: Notice of proposed premium rate change
Empire Health Choice HMO, Inc.
Empire Platinum Guided Access Plan
Individual Coverage
HIOS Identification#: 

I have a long history with Empire Blue Cross/Blue Shield and have admired the service and professional courtesy the company has shown toward my health inquiries & to me in the past. However, since I enrolled in the Empire Platinum Guided Access CEAF Plan (which went into effect on January 1, 2014), I have seen the level of service decline severely. Some of the customer service personnel are not as helpful and knowledgeable as they could be in that they cannot give me a direct answer to my questions because they either: (a) do not readily know the answer; (b) do not take the time to do some research and call me back; or (c) put me on hold several times to find an answer. These hold periods can be very annoying. Furthermore, depending upon the service representative I speak with, I may get a different answer to the same question! This leads to a lot of confusion and frustration. In addition, the “wait time” before I speak with a representative can be excessive. All in all, it generally takes a number of telephone calls to resolve a single issue!

To request an 18.4 % premium increase during 2015, in lieu of the afore-mentioned problems, is an affront to the customer and to your office. The attitude reflected by the request exemplifies the new culture at Blue Cross/Blue Shield which implies they deserve an increase in premium rates, even though they have done very little to improve their customer service! Please do not award Empire Blue Cross/Blue Shield a premium increase any more than the increase in inflation; also suggest they obtain the balance by improving their management and service of these plans in order to accomplish a reduction to their costs and not an increase in ours!

Sincerely,



7-6-14

COMMENTS

To DFS about the proposed rate changes

[REDACTED] received your letter dated June 18, 2014 about the proposed rate changes.

My insurer is Empire Health Choice HMO, Inc.

The benefit plan is Pathway Enhanced, individual coverage for me and my 13 years old daughter

[REDACTED]
My HIOS ID# is [REDACTED]

I am a self employed piano teacher with a very unsteady income, CAN'T AFFORD the increase in a health insurance and don't know what to do and how to pay your increase.

Please help and advice, please don't increase the rate. I am a widow and don't have family.

Please send your answer in writing.

RECEIVED

JUL 09 2014

HEALTH BUREAU
N.Y.C. OFFICE

Re: Increase 18%

Employee Health Care HMO ^{Inc} RECEIVED

Employee

JUL 09 2014

Individual Coverage

HEALTH BUREAU
N.Y.C. OFFICE

Hios: #

I hope the rates will NOT increase

As the choices of doctors are
very limited, ^{personal} customer service is
almost non-existent. And it is
hard enough to keep up with these

rates, as it is. And 18% is extraordinarily
high for an increase ^{Thank you}

[REDACTED]
To
NYS Department of Financial Services
Health Bureau – Premium Rate Adjustments
[REDACTED]

RECEIVED
JUL 09 2014
HEALTH BUREAU
N.Y.C. OFFICE

Re: **Empire HealthChoice HMO, Inc**
Empire Core GuidedAccess Cabs
[REDACTED]

Attn: New York State DFS

I am in receipt of a Notice of proposed rate change which Blue Cross Blue Shield finds as necessary but in truth quite unnecessary.

I am an individual who had lost my health coverage effective Apr 1 2014 due to the reason that my policy at that time was not in compliance with the terms of the ACA. I purchased an individual coverage from Blue Cross Blue Shield which I thought was good enough for me after reading and understanding most of the insurance jargons ultimately benefiting the insurer. I keep paying the premiums on their terms and keep my policy active.

Now, I am in receipt of this Notice of proposed rate change which Blue Cross Blue Shield . I am quite baffled and disappointed to see the insurer is requesting a 15.6% raise which is unheard of. Increasing earnings and profits may be the reason. (In my case I have not even made a doctor visit).

I would like to emphasize that the “ Why we are requesting a rate change” appears to be quite vague without any merits. Most reasons are not in anyway relating to me as an individual purchaser of this coverage. In the event of DFS even consider looking into this request , please do so ONLY after making a thorough evaluation of reasonability and necessity. I hope DFS stands with enough authority and discretion in such matters.

In the unlikely event of a raise, persons like me may find it unable to pay increased premiums and forgo coverage and end up seeking benefits from Govt. programs further straining the whole system.

I request DFS to reject this request for premium increase and if possible to impose a reduction of a minimum 15.6%.
[REDACTED]



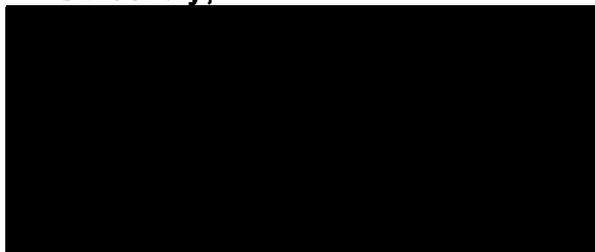
RECEIVED
JUL 10 2014
HEALTH BUREAU
N.Y.C. OFFICE

To Whom It May Concern:

I received notification of a proposed rate change to my Empire Guided Access plan, ID [REDACTED] My financial situation has not improved and I am currently working as a consultant and do not have a consistent income. It would be a great hardship to sustain an increase in premium charges.

Thank you kindly for your consideration.

Sincerely,



RECEIVED

JUL 10 2014

HEALTH BUREAU
N.Y.C. OFFICE

7/7/14

To Whom IT MAY CONCERN:

INSURER - Empire Health Choice HMO, INC
Benefit Plan - [REDACTED]
Individual Coverage
HIOS ID# [REDACTED]

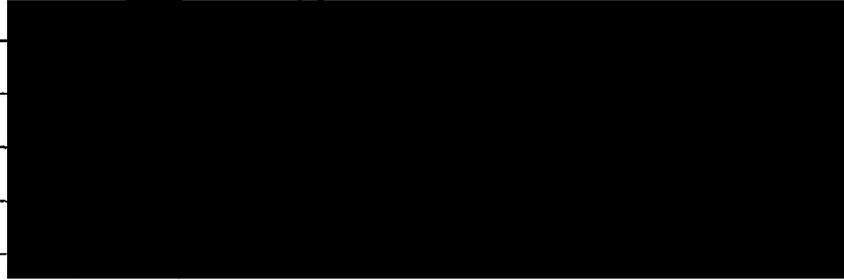
I AM CURRENTLY INSURED BY
Empire [REDACTED]
UNDER INDIVIDUAL PLAN. I AM
WRITING TO YOU TO COMMENT
ABOUT THE PROPOSED RATE CHANGE
THAT WILL HAPPEN IN 2015.

I HAVE BEEN INSURED WITH
YOU FOR MANY YEARS AS AN
INDIVIDUAL AND ALWAYS PAID HIGH
PREMIUMS. THEN CAME TIME THAT AS OF
JANUARY 2014 RATES CHANGED
AND ALSO THE MEDICAL COVERAGE.
NO MORE COULD I SEE "ANY" OF
MY DOCTORS OF 30 YEARS OR EVEN
GO TO THE SAME LAB'S FOR MEDICAL
TESTING. THIS HAS MADE ME VERY
UPSET DUE TO THE FACT I AM STILL
PAYING HIGH RATES FOR MEDICAL
COVERAGE. I AM NOT HAPPY WITH
I KNOW CHANGE IS HARD SOMETIMES
BUT PAYING HIGHER RATES AND
NOT GETTING THE COVERAGE YOU
WANT MAKES THIS EVEN HARDER.

PREMIUMS GOING HIGHER WITHIN
A YEAR AND MOST LIKELY EVERY YEAR
IS HARD TO THINK ABOUT. PLEASE KNOW

that I understand that I must
PAY MORE for individual INSURANCE
but this is too much.

Thank you for letting me
comment on this matter that
is a little upsetting



RECEIVED

JUL 10 2014

HEALTH BUREAU
N.Y.C. OFFICE

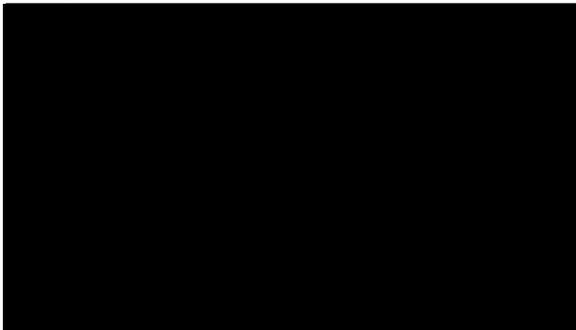
July 8, 2014

To: NYS Department of Financial Services,

I have received Empire's letter about the increase in insurance rates. I do not agree to any increase. The amount that I pay, \$456.87 is exorbitant enough. I have just started to use the supposed services that this insurance provides, and already there are problems. I have received a bill from a doctor that is in my network. From my understanding, I have the type of plan with a \$30.00 co-pay, and the rest of the cost is covered by Empire. Receiving the bill from the doctor has thrown me off financially, as has the notice regarding the 10% insurance fee increase. I cannot afford the increase. Please either decrease the fee, or keep it the same. It is expensive enough.

Name of insurer: Empire HealthChoice HMO, Inc.

Empire benefit plan: Empire Essential GuidedAccess



7/6/14

Dear Sir,

I am an Empire [REDACTED]
member. Please send me information about
the January 2015 rate increase.

Sincerely,

[REDACTED]

RECEIVED
JUL 10 2014
HEALTH BUREAU
N.Y.C. OFFICE

[REDACTED]

NYS Department of Financial Services
Health Bureau – Premium Rate Adjustments

[REDACTED]

RECEIVED
JUL 09 2014
HEALTH BUREAU
N.Y.C. OFFICE

July 8, 2014

To Whom It May Concern:

I was told to write this letter in response to the June 18, 2014 letter which proposed rate changed.

My status has changed since I originally completed the form on the internet.

I was let go from:

[REDACTED]

I am unable to get a separation or termination letter from my employer, since I may not step on the premises or call !

The Director's Name was:

[REDACTED]

[REDACTED]

Thank you for your attention!

[REDACTED]

RECEIVED

JUL 17 2014

July 14/2014

HEALTH BUREAU
N.Y.C. OFFICE

TO: NYP Dept. of Financial Services

Health Bureau - Premium Rate Adjustments,

I'm replying re. rate changes. I do not see any justifications for a 18.4% rate increase. My rate is already HIGH; I pay separate for my dental coverage. Already on 2014 Pediatric Dental Benefits included and copays to different insurance exist already.

I've NOT used my insurance (medical) insurance THANKS GOD for any cost; no drug, no hospitalization.

The more people buy insurance, more money insurances make, lots of healthy people bought insurances this year therefore the cost (premium) should be lower. our cost of living or wage increase is MUCH MUCH less THAN 18.4%. I'm asking you NOT to grant an increase.

My insurer name is: Empire Health Care HMO, Inc.
- Empire Benefit Plans Empire Platinum Guided Access.
I've an individual coverage and my HIOS ID number is: [REDACTED]

I'm counting on you to do the RIGHT thing i.e. NO INCREASE.
THANKS & respectfully
[REDACTED]

July 3, 2014

I have NOT been able to obtain an internist through Empire or other silver plans -

*****SCH 5-DIGIT

[Redacted]

MD is they say are in their plan are NOT MD's

trying to get into their plan cannot

I am paying - BUT HAVE NO COVERAGE

Important Information Regarding Your Past Due Premium

Second Notice of Grace Period

[Redacted] Due Date: 06/01/2014

[Redacted]

I am paid in full - every month full payment in collected from checking Account transfer.

We're writing with some important information about your Empire BlueCross BlueShield and Empire BlueCross BlueShield HMO Individual health coverage. Your premium for Medical coverage was due on 06/01/2014. As of the date of this Notice, which is required by federal law, our records indicate we have not received your full premium payment.

If you have already made your payment, you may disregard this Notice and any reminder invoice you receive. You can check the status of your payment at www.empireblue.com. Just log in to your account and click on the Pay My Bill Online link. If you haven't registered on our site yet, click Register to get started. You can also check your payment status using our automated phone system at the number on the back of your card.

Grace Period and Potential for Cancellation

You have a three month grace period from 06/01/2014 to pay your premium in full in order to avoid cancellation. In addition, full premium payment must be received by 07/02/2014 for claims to be paid beyond that date. If we do not receive your full premium payment on or before the last day of your grace period, your coverage will be cancelled as explained in your policy. The reason for cancellation will be non-payment of premium and your health status or need for health care services will not be considered. Any partial payment of the total amount due will not be sufficient to remove your coverage from the grace period and prevent cancellation.

Reinstatement of coverage terminated for nonpayment of premium is not available. If you submit premium payment after the end of your grace period, coverage will not be reinstated. To reapply for coverage, you will need to submit a new application and you must be eligible for coverage under an open enrollment period or qualify for a special enrollment period.

Please call me

[Redacted]

[Redacted]

OHLLD010 COM5 20140705B00 J963 20140704 018665 Env [3.882] 1 of 2

July 10, 2014

RECEIVED
JUL 17 2014
HEALTH BUREAU
N.Y.C. OFFICE

I am writing regarding the proposal from Empire Blue Cross to raise premium rates. My insurer is Empire HealthChoice HMO, Inc. I have individual coverage. My HIOS id number is:

[REDACTED]

My benefit plan is 254 Empire Core Guided Access

I am opposed to this rate hike, feeling it would cause hardship for many who are paying for their own health insurance. It is important to look at all of the factors and pros/cons to this proposal as I'm sure you will do.

Furthermore I have not seen evidence of the insurance company having earned a rate increase. I personally have received very poor service. Initially I was receiving bills for a plan I hadn't selected in addition to the one I did select. After, literally, hours of calls and e-mails that was finally resolved with the help of Anthem Blue Cross (Empire wouldn't address my concerns and shunted me off to another customer service). Then I did not have a dental plan that I had applied for and was accepted for. I finally gave up on that so do not have a dental plan at all, except the Pediatric plan mandated by the government, although it has no benefit to me.

While I understand that poor service is no less costly than appropriate and efficient service, I feel the company has certainly saved dollars on clients like me. I have had this health insurance for over 7 months now but have yet to see a dr. I am too concerned that with the way Empire has handled the basic things so far that if I did go to the dr. I would end up in a nightmare of bills with no support to get it straightened out.

I urge you to consider all of the residents of this state who would be adversely affected by this rate increase.

Additionally, I would appreciate your review of allowing more health insurance providers to operate in the state of NY. I believe that more choices for consumers would encourage companies to improve their customer service and support.

Thank you for your time.

[REDACTED]

July 7, 2014



RECEIVED

JUL 09 2014

NYS Department of Financial Services
Health Bureau - Premium Rate Adjustments

HEALTH BUREAU
N.Y.C. OFFICE



Re: Health Insurance Premium Rate Hike of 18.4% requested by Empire Blue Cross/Blue Shield for 2015

From July to November in 2011, I wrote various letters to



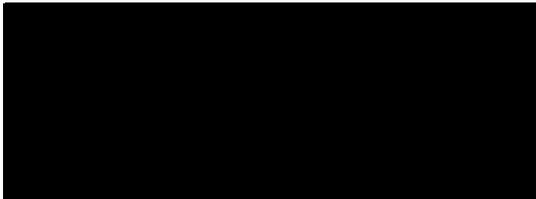
New York State Insurance Department regarding the ridiculous health insurance premium rate hike requested at that time by Blue Cross (HealthChoice GMO). The rates kept going up until I was paying more than \$1,500.00 per month premiums in 2013 !!!

When the Affordable Care Act took effect on January 1, 2014, I was happy to take advantage of it and enrolled. Now that my premiums are reasonable, I cannot believe that Blue Cross/Blue Shield is requesting another obscene rate hike so soon !!! Therefore, I request that you deny them this rate hike or any rate hike over 0.5%.

This open attempt at destroying the Affordable Care Act should not be permitted. Insurance companies should NOT be "for profit" nor should they be traded on the stock market. This whole situation only proves that "Universal Health Care" is the only way to stop this highway robbery of the people by insurance companies. After AIG stole the people's tax dollars with their derivatives scam and were not held accountable for it, I believe you have an important job keeping a watchful eye on them. Please do that job and deny the rate hike.

Thank you.

Sincerely,





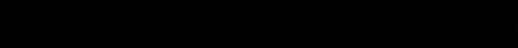
June 24, 2014

RECEIVED
JUN 25 2014
HEALTH BUREAU
N.Y.C. OFFICE

NYS Department of Financial Services
Health Bureau – Premium Rate Adjustments
1 State Street
New York, NY 10004

Dear Sir or Madam:

I disagree with the proposed 17% rate increase for my Empire BlueCross BlueShield insurance. My insurer is Empire HealthChoice HMO 


My coverage began March 1, 2014. I fortunately have had no cause to see any doctors in the past eight months and thus during the approximately four months of coverage, I have made no claims. Nor do I anticipate making any.

This plan provides me with potential care from only a limited set of doctors, a small subset of those in Empire BlueCross Blue Shield. None of my long-term (I've lived in New York for 27 years) doctors are within that set.

Neither this plan nor any of the others offered to individuals in New York provides reimbursement for visits to doctors "out of network." Hence, I chose this particular plan for catastrophic coverage. There were no plans that specifically provided only catastrophic coverage but my choice of the highest deductible certainly reflects my intent with respect to catastrophic coverage. I am fortunate to be in very good health. Should I need the services of my long-term doctors, I hope to negotiate reduced fees because I am essentially self-insuring for their care.

In the past, annual increases in my insurance costs were 2-5%. I am unemployed and cannot afford to pay an increased Empire BCBS rate for a plan under which I am unlikely ever to make claims.

Sincerely yours,





NYS Department of Financial Services
Health Bureau – Premium Rate Adjustments
1 State Street
New York, NY 10004

RECEIVED
JUN 25 2014
HEALTH BUREAU
N.Y.C. OFFICE

To Whom It May Concern,

I received a letter from Empire Blue Cross stating that they are requesting a rate increase for:
Empire HealthChoice HMO, Inc



I strongly oppose this rate increase. When I first signed up for this plan, the state's system showed that all of the specialists we used were in the plan. Now as we have been going to them, each everyone has stated they are not accepting this plan at all, and will not consider it. My wife recently was recommended for breast surgery. On all of Long Island only one doctor was listed and they were in the city, not close to us at all. I called Empire and I was told that NY and California are having a lot of issues since all the doctors in both states are refusing to take these plans.

Instead of a rate increase we should be seeing a rate reduction as there are no specialists that we can use with this plan.

Thank You





6/21/14

ORDER NO.		INVOICE DATE	
DATE SHIPPED		SHIPPED VIA	
NO. PCS.	WT.	FOB	TERMS

Empire Blue HMO
 NYS Dept of Finance Sucs
 Health Bureau
~~Other~~ Premium Adjust Bureau



Please Do
 The Best
 You Can
~~Thank you~~

To Mgmt - I'm truly sorry to right this letter
~~to you~~
 This letter is in Reference to
 The Rate Hike imposed of 18.4%
 Due in 2015 -

Please Reconsider The Increase
 Seriously that is some Rate Hike
 From one year to another. Inflation
 is yously about 2 or 3% in a year

I'm sorry to right this letter
 But, I'm trying to hold on to
~~my~~ 60 yr old Business
 That can't withstand the pain
 of such increases. The customers
 can't afford me to raise my prices by 20%
 Furthermore Business is so bad that
 I can't afford much. Between
 TXS, Insurance's, Groceries, Fuel
 Business is so bad that I can't even
 cut myself a proper pay check this
 year so far. NO PAYCK that's how bad
~~the~~ it is. Between competition and the
 price of MAT. Not enough customers. It's
 A sorry situation on this side of the street.
 I'm sorry to cry to you but things aren't getting any easier or better
 Sorry for any inconvenience in the matter

RECEIVED
 JUN 25 2014
 HEALTH BUREAU
 N.Y.C. OFFICE

RECEIVED

JUN 25 2014

HEALTH BUREAU
N.Y.C. OFFICE



June 22, 2014

NYS Department of Financial Services
Health Bureau – Premium Rate Adjustments
1 State Street
New York, NY 10004

To Whom It May Concern:

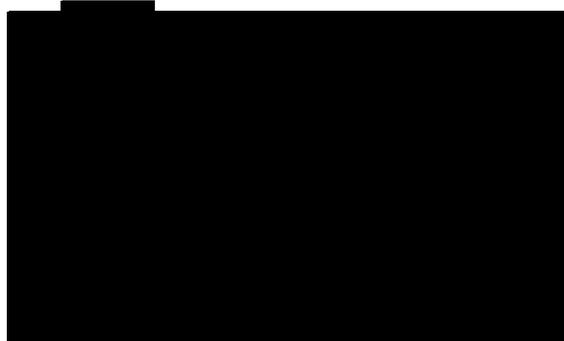
Yesterday I received a letter from my insurance company, which vaguely advised it has requested approval from your department for nearly a 20% premium increase. I really hope this request will be denied.

I don't understand how much money these insurance companies need to make; I've never even used my policy yet, so they've made nothing but profits from me as it is. The plan I have isn't even worth what I'm already paying, with its huge deductible and endless list of exclusions and exceptions, but it's all I can afford right now to give myself some minimal protection and to comply with the new healthcare laws.

If there's any chance of stopping the increase at this point, please do so. And if my premium must increase, there should be a corresponding increase in the quality of the coverage.

Thank you very much for your consideration.

Sincerely,



June 21, 2014

NYS Department of Financial Services
Health Bureau – Premium Rate Adjustments
1 State Street
New York, New York 10004

RECEIVED
JUN 25 2014
HEALTH BUREAU
N.Y.C. OFFICE

Dear Sir or Madam

I'm writing to ask the DFS to deny Empire Blue Cross Blue Shield's request for a premium rate increase. My previous health insurance carrier was able to provide coverage at a lower premium with much lower co-pays and deductibles; however that plan is no longer available.

The details of my coverage are as follows:

My insurer is Empire HealthChoice HMO, Inc.

[REDACTED]

Any increase in my premium could force me to cancel the policy and be uninsured.

Sincerely,

[REDACTED]

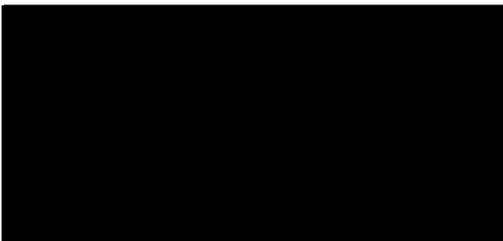
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RECEIVED

JUN 26 2014

HEALTH BUREAU
N.Y.C. OFFICE

June 18, 2014



0-3 TAN *****AUTO*****DIGIT 11502 UM0023931



Notice of proposed premium rate change
Empire



We have filed a request with the New York State Department of Financial Services (DFS) to approve a change to your premium rates for 2015. New York Insurance Law requires that we provide a notice to you when we submit requests for premium rate changes to DFS.

DFS is required by law to review our requested rate change. DFS may approve, modify or disapprove the requested rate change.

Proposed premium rate change

Your current monthly premium is: \$786.64.
If approved, the percentage change to your premium is 18.4%..

If you enrolled through New York State of Health, the state's health plan marketplace, and you qualified for financial assistance, called an Advanced Premium Tax Credit (APTC), your current premium is less than the amount shown above. If you qualify again next year, your rate will continue to reflect the APTC. New York State of Health will calculate your eligibility for financial assistance each year.

Please note that while we try to provide you with the most accurate information possible, the final rates may differ based on the benefit plan design and other features you select on renewal. Also, the final, approved rate may differ because DFS may modify the proposed rate.

Why we are requesting a rate change

These are the main reasons we are requesting a rate increase:

- Our 2015 rate filings reflect the rising cost of medical care, a new pool of customers, our new provider networks, and changes to taxes, fees and the federal transitional reinsurance program.
- More benefits are available to more people.
- In 2015 there will be coverage and benefit changes to most plans, including:
 - Inclusion of, or changes to, Pediatric Dental benefits.
 - Cost-sharing changes, such as deductible, copays, coinsurance, or out-of-pocket maximum for hospital and doctor services and prescription drugs.

no need for Pediatric Dental (we have no kids!!)

Also no need for





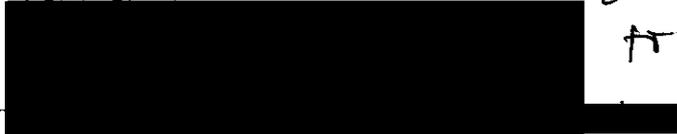
30-day comment period

You can contact us or DFS to ask for more information or submit comments to DFS about the proposed rate changes. The comments must be made within 30 days from the date of this notice.



Comments or requests for more information on the proposed rate change may be submitted to:

NYS Department of Financial Services
Health Bureau - Premium Rate Adjustments



If now we pay 371.00 how do you think we will be able to pay 786.64 \$, MORE THAN DOUBLE!!! I have to send a copy of this to consumer affairs because this looks that was planned just to get new customer and to change rates after 7 months.

If you choose to submit comments to DFS, please include the following information:

- The name of your insurer, which is Empire HealthChoice HMO, Inc.
- The name of your Empire benefit plan as shown on your Empire ID card.
- Indicate you have individual coverage.



Written comments submitted to DFS will be posted on the DFS website with all your personal information removed.

Plain-English summary of rate change

We have prepared a plain-English summary that provides a more detailed explanation of the reasons why a premium rate change is being requested. You can find this information at the following websites:

- 

Notice of approved premium rate

After DFS approves the final premium rate, you will receive final rate information at least 60 days before your 2015 renewal date.

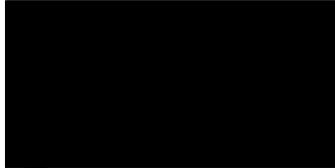
Sincerely,



We can not afford a higher rate for year 2015, so please provide us with an empire plan that fit our range price of 400 \$ a month, also I do not need dental and vision plan. Thank you



NYS Department of Financial Services
Health Bureau- Premium Rate Adjustments



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JUN 26 2014
HEALTH BUREAU
N.Y.C. OFFICE

To Whom It May Concern:

My "insurer" is Empire HealthChoice HMO, Inc. I have individual coverage under the Empire Gold plan, and my Empire Blue Cross Blue Shield I.D. number [REDACTED]

This battle is my life at present. I have been writing this letter for a month, updating my story as it is unfolding. I have spared you the most recent details, but I can tell you, raising my premium, which I am already receiving a tax break on because I am so POOR, raising my premium 18.4% when I can't afford to pay it as is NOW- IS ABSOLUTELY UNACCEPTABLE. How much does Mr. [REDACTED] make annually?!?!? TAKE IT OUT OF HIS DISGUSTING BILLION DOLLAR SALARY!!! They have paid for nothing for me, covered NOTHING without several appeals and several hours a week-every week- on the phone fighting, and they want MORE money?!?!?!? I am a type 1 diabetic, and they want me to pay them more money to kill me slowly?! THIS IS CRIMINAL! I AM BEGGING YOU TO SEE REASON, TO LOOK AT THIS CORRUPTION, AND SAY NO!

My waking nightmare:

I was on Healthy NY, which was cancelled effectively Jan. 1st, 2014. I was not notified this was happening until a month after I renewed my insurance plan with Aetna in August of 2013. They then expected me to meet my medical supply deductible of over \$1,000 (which I was never notified that it even existed) in 4 months. They refused to pro-rate it. I am a Type 1 Diabetic on an insulin pump. I was on Healthy NY because I work for a non-profit art center (Rockland Center for the Arts), barely making it paycheck to paycheck. I am grateful to have a job I enjoy when so many of my peers and family have been unemployed for the last few years. However, I got slammed with an \$800 bill from my pump supply company. I then was forced onto the exchange, where I thought I was choosing the best plan with Empire Blue Cross Blue Shield.

They took over 2 weeks to send me my I.D. card, forcing me to pay \$87 out of pocket for generic antibiotics to treat a sinus infection. Great start. Type 1 Diabetes is an auto-immune disorder and I am lucky to not get sick as often as some of my diabetic peers. Since Jan. 1st, Empire Blue Cross Blue Shield has denied every single one but 3 of my prescriptions. That's 3 out of at least 5! One of the denied medications was a generic prescription allergy medication, because I otherwise am covered in hives from something as simple as soap (over the counter allergy medicine never works for more than two weeks). Another denied prescription was for my pre-ulcer condition (gastritis). It took 3 months to get that appealed! If I wasn't lucky enough to be able to live off samples from my doctor's office, I'd have

6/24/14

To Whom It May Concern

I don't think the proposed rate increase is fair. 18% is much too high for people to pay.

My coverage is guided access. cbjw by Empire Health Choice Amc Inc. I have individual coverage. My

Hios id # 15 [REDACTED]

I hardly use my coverage for illness & I'm paying almost \$400 a month plus paying for childrens dental coverage (I don't have children.) I only live on social security!

Please try to leave the coverage the same as it is.

Thankyou
[REDACTED]

RECEIVED
JUN 26 2014
HEALTH BUREAU
N.Y.C. OFFICE

①

Dear DFS,

June 25, 2014

I am taking the time out of my busy hard working life to write this letter concerning Empire Blue Cross - Blue Shields request for a premium rate change.

I am in shock and awe that this can even be a consideration at this time. The NY state of health plans market place has only been put effect recently. I have only had access to my plan since Feb - 2014. (Only 5 months!) and I already receive a notice of plans to raise my rate in 2015!

Myself, and everyone else who have been given access to the new insurance rates are under the impression that the reason this new plan was established was so all people are able to purchase health insurance without struggling to pay for it. What is the point of dangling that prospect of having health insurance that we can actually afford - then →

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JUN 26 2014

HEALTH BUREAU
NY OFFICE

propose taking it away by raising rates as soon as possible - Who is this helping? The insurance companies! Can this be helping the people? I think not! (+ 18.3%) - It must be a cruel joke!

My family is barely surviving in this economy. We are middle class Americans - who are becoming poor! The insurance rates in this county are one of the reasons we are struggling. We are lucky just to be able to afford this insurance rate - If you raise them we will have to drop the insurance & have none.

Some of the increase reasons the ins. co. listed for the raise - were - pediatric dentist - taxes - fees - I have no dental ins - and have no reasons to use pediatric dentists - why should ins. co. taxes & fees be my burden -? (I am a school teacher - in a private school that does not provide health ins.)

3

This whole thing seems - unfair -
and in no way helps the people
it is meant to help unburden -
you could not seriously consider
this rate raise so early on in
the new program - unless you
do not have any sympathy
for those of us who work
hard everyday to provide our
families decent lives -

Thank you for your time
and thoughtful consideration -

[REDACTED]

[REDACTED]

Insurer - Empire HealthChoice HMO, inc.

Plan - Silver Guided Access

Coverage - Individual

[REDACTED]

(4)

June 25, 2014

Dear Empire Blue Cross, Blue Shield,

Here is a copy of a letter
I sent to DFS in reference to
your requested rate increase for us -
I hope you take this
information into consideration -

Thank You -



[REDACTED]

June 24th 2014

NYS Department of Financial Services
Health Bureau – Premium Rate Adjustments

[REDACTED]

Name of Insurer: Empire Blue Cross Blue Shield

Plan: Empire Platinum, Guided Access

Have Individual coverage/family

[REDACTED]

Increase requested by Empire: 18.4%

Dear Sir:

I would like to request that the above mentioned plan have a monthly cost reduction of 18.4%. I wish I had a snow ball chance in hell to get this approved by your Bureau. I have no doubt that you will unfortunately approve the increase just as you did for 5 to 10 years when my company carried Oxford. Eventually everyone at my company had to quit the plan due to the absurd rate Oxford demanded. Every year (once 2 times in a year) Oxford would request a 15%+ increase and your department would always approve it. Do you get regular kickbacks???

Inflation isn't at 18%. U.S health care is the most expensive in the world....and not the best in the world. Stop the madness.

The reasons they give (see attached letter) sound like nonsense. Rates go up. Treatment approval and pharmaceutical approvals go down. It's not the Empire's of Oxford's that are at fault for the yearly increase...it's your department. Can't wait till you are on "Sixty Minutes". Soon I hope.

Frustrated,

[REDACTED]

[REDACTED]

RECEIVED
JUN 26 2014
HEALTH BUREAU
N.Y.C. OFFICE

June 24, 2014

Attention: NYS Department of Financial Services
Health Bureau – Premium Rate Adjustments

[REDACTED]

RECEIVED
JUN 26 2014
HEALTH BUREAU
N.Y.C. OFFICE

Re: [REDACTED]

To Whom It May Concern:

I would like to request an appeal to the 18.4% insurance rate increase proposed in the June 18th letter "Notice of proposed premium rate change **Empire Silver Guided Access** for my [REDACTED]
[REDACTED]

I have **individual coverage**, am a healthy individual using my insurance as preventative care. I'm a self-employed freelance worker. An 18.4% increase in less than 6 months of having this policy will force me to find another provider. I have yet to even take advantage of the benefits of this plan coverage.

I would like more information regarding this absurd increase. Please let me know if there is anything I can do to avoid this increase.

Thank you for your attention to this request.

Sincerely,
[REDACTED]

[REDACTED]

RECEIVED

JUN 26 2014

HEALTH BUREAU
N.Y.C. OFFICE

DFS:

6/23/14

I've just been informed that Empire Health Choice HMO Inc. wants to increase my premium by 18.4% next year. My health insurance is killing me NOW! The stress of coming up with the current premium is HUGE. My pay won't increase 18.4% next year. I'll have to cancel my so called "affordable" healthcare. The deductible is huge. How can they want me to pay MORE? Please, deny them the increase it's already too much money!

Thank you

Individual Coverage
Empire

RECEIVED

JUN 27 2014

HEALTH BUREAU
N.Y.C. OFFICE

June 25, 2014

[REDACTED]

Re: Empire Healthchoice HMO, Inc.

[REDACTED]

HAVE - EMPIRE PLATINUM Guide Access

[REDACTED]

In regard to this letter about A
RAISE if you RAISE the premium
MORE than I am paying now I DROP
My Insurance PLAN Totally because MY
EXPENSES for the MONTH DON'T come
to premium AMOUNT - MOST people MY
Age will do the SAME - IS A struggle
to pay even this AMOUNT per month
FORGET the RAISE - AINT HAPPENING

[REDACTED]

From:



pt. 2A

To:

NYS Department of Financial Services
Health Bureau - Premium Rate Adjustments



Date:

June 24, 2014

RECEIVED
JUN 27 2014
HEALTH BUREAU
N.Y.C. OFFICE

To whom it may concern:

I am enclosing a recent notice that I have received from Empire Blue Cross Blue Shield in which BC/BS has informed me that they are requesting a change (increase) in my premium rates for next year.

It is my opinion that Empire BC/BS has absolutely no cause to increase my rates or anyone else's. Here is a large insurer that suddenly has new clients due to the ACA and they are "crying poor". I find their customer service to be abysmal, and the DFS should be reminded that so did our governor, who requested that members of this health plan be refunded premiums for the month of January 2014 because Empire was not ready to handle so many new members.

As the DFS, it is your job to represent *New Yorkers*, not Empire BC/BS and their stockholders. A 17% raise is not deserved. NO increase is deserved.

Please contact me with any questions.

Thank you,



6/24/14

NYS Dept. of Financial Services
Health Bureau - Premium Rate Adjustments

RECEIVED

JUN 27 2014

HEALTH BUREAU
N.Y.C. OFFICE

To Whom It May Concern:

I am currently insured by Empire Health Choice HMO, Inc.,
on the Empire Silver Guided Access cdid plan,

I request that no rate change be approved for 2015.

I am finally able to afford coverage at a reasonable
rate combined with a subsidy and deductible which
I can barely manage. A \$76.42 increase a month,
or \$917.04 a year increase PLUS a possible deductible
and out-of-pocket maximum for hospital, doctor and drugs
increase would be counter-productive to the purpose
of Obama-Care. It's supposed to be AFFORDABLE
health care.

Please do not approve their request to raise rates.

Sincerely,

[REDACTED]

[REDACTED]

RECEIVED
JUN 27 2014
HEALTH BUREAU
N.Y.C. OFFICE

June 25, 2014

NYS Department of Financial Services
Health Bureau - Premium Rate Adjustments

[REDACTED]

RE: Empire Health Choice HMO, Inc.
Empire Blue Cross Blue Shield Empire Gold Guided [REDACTED]
[REDACTED]

To Whom It May Concern:

Please be advised that I am strongly urging you to DENY Empire's proposed 18.4% rate increase on my premium for the 2015 year. Simply put, as the owner of a business, along with all of the other costs of living, I cannot afford it. They can. They state that they need to increase costs for "the rising cost of medical care," amongst others. This company makes billions of dollars a year. Quality of human life should not be a business. Please do not allow them to fill their pockets even more.

Sincerely,

[REDACTED]

RECEIVED
JUL 01 2014
HEALTH BUREAU
N.Y.C. OFFICE

NYS Department of Financial Services
Health Bureau – Premium Rate Adjustments

[REDACTED]

June 30, 2014

To Whom It May Concern:

The application for an 18.4% rate increase by the Empire HealthChoice HMO represents an egregious abuse by a NY State approved health insurance provider and must be denied.

In January, 2014 I purchased individual coverage from Empire HealthChoice HMO, Inc. [REDACTED]

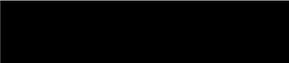
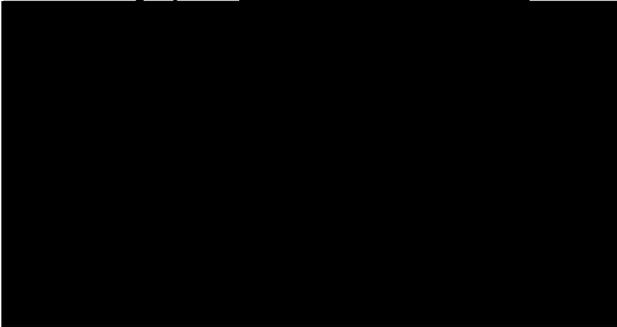
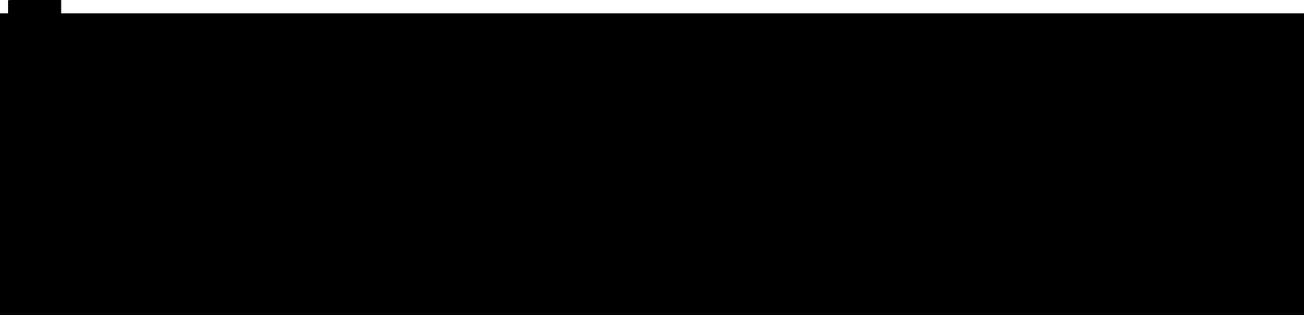
[REDACTED] Now only five months later, I received notice of their request for a rate hike of 18.4%.

I chose Empire because it is what I can afford, but it resulted in my losing my primary care physician and specialists and required a difficult search for new doctors. Secretaries who at first confirmed that their physicians were on my Empire plan, soon after said that they were not. If you approve this increase, I would be obliged to leave Empire and would probably once again lose these new doctors, hoping that I would be able to find others who are associated with the new plan. Does NY State's iteration of the Affordable Care Act advocate for continuity of care and affordability for the consumer?

Responsibility for my father's total care limits my financial resources so that, as hard working as I am, I am financially stretched and rely on your conscience, consideration and sense of fairness. While our country has embarked on a more affordable and inclusive health system, please do not let its aims be eroded by the insurance industry's greed that in my case would squeeze the middle class beyond endurance. Profiteers are heavily represented by lobbyists, but who represents the public?

Please deny Empire any rate increase. Its increased membership should make it more possible to maintain their current rate. I look forward to hearing your decision.

Sincerely,

A black rectangular redaction box covering the name of the sender.A large black rectangular redaction box covering the address and contact information of the sender.A large black rectangular redaction box covering the main body of the letter.


NEW YORK, NY 10022

July 1, 2014

NYS Department of Financial Services
Health Bureau – Premium Rate Adjustments
1 State Street
New York, NY 10004

RECEIVED
JUL 01 2014
HEALTH BUREAU
N.Y.C. OFFICE

Please disapprove the premium rate increase that my insurer Empire HealthChoice HMO, Inc, is requesting from you for year 2015 and beyond.

My benefit plan is Empire Silver GuidedAccess and I have individual coverage.

My HIOS identification number is 80519NY0160162.

My new and current monthly premium following the Affordable Care Act is \$418. An 18.3% increase results in a significant hardship to a nearly \$500 monthly premium, close to what I was paying before discontinuing my old insurance.

I emphasize my request that you please disapprove this rate increase.

Sincerely,



[REDACTED]

June 26, 2014

NYS Dept Financial Services
Health Bureau – Premium Rate Adjustments

RECEIVED
JUN 30 2014
HEALTH BUREAU
N.Y.C. OFFICE

[REDACTED]

Re: Rate Change
Empire Health HMO, Inc.

[REDACTED]

Dear DFS:

Enclosed is the notice of rate change request sent to me by Empire BC/BS.

I urge you to approve a much smaller rate increase than the 17.9% requested by Empire for the following reasons:

- Inflation is running at less than 5% annually. This increase is three times the rate of inflation increases.
- They indicated that one of the reasons for the rate change is that more benefits are available to more people. That means premiums collected by Empire from more people - this should offset and rate increase. It should also give them greater leverage to bargain with providers and lower costs as they represent more people.
- They also cite changes to pediatric dental plans. We have no children and do not take advantage of pediatric dental
- They cite new provider networks. They should negotiate hard to keep costs down.

In short, the only item that Empire cites that they have no control over is rising taxes and changes to federal transitional reinsurance program. They have not yet responded to my request for information on the percentage increase in taxes they have been notified about. I suspect that this is because it is nowhere near a 17.9% rate increase.

Please do not grant them the full 17.9% increase in premiums. This will take the pressure off of Empire to negotiate hard to reduce healthcare costs and burden trapped insured like us with skyrocketing costs for health coverage.

Sincerely:

[REDACTED]

6.27.14

[REDACTED]
Empire Healthchoice HMO, INS.
Empire BCBS - Empire Platinum Guided Access CCAF
[REDACTED]

RECEIVED

JUN 30 2014

HEALTH BUREAU
N.Y.C. OFFICE

To Whom It May Concern:

I am aware that the Insurance increase is going up to 18.4%.

I am working part-time and as of now I am paying \$348 per mth. which includes the tax credit and can barely afford to pay this current amount. I need this tier of insurance because it has the most coverage for my health issues. I cannot go to a lower tier because its more of an out-of-pocket expense that I cannot afford.

This insurance is supposed to be affordable healthcare and I can barely afford it. If this rate increase takes affect I will not be able to obtain the coverage I need.

My current rate is too high as it is. Please do not raise my rate.

Sincerely,

[REDACTED]

June 27, 2014

RECEIVED

JUN 30 2014

HEALTH BUREAU
N.Y.C. OFFICE

Insurer: Empire Health Choice HMO

Individual Coverage

Dear Sir or Madam at NYS Department of Financial Services:

I am writing with regard to a letter I received from Empire about the proposed rate increase.

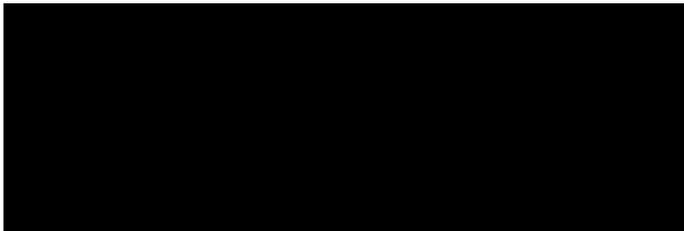
After just one year with this Health Care Reform policy created to conform with the Affordable Care Act, I think it's safe to say that an **18.3%** rate increase is excessive.

Please consider the fact that the deductible is **\$2450.** with an out of pocket amount of **\$6350** per year. In addition, this is a very restrictive plan; limiting in terms of doctors and hospitals that one is allowed access to.

According to the 83 page Empire HMO contract for Essential Guided Access (cdib), Empire can deny coverage if not deemed medically necessary. And referrals, phone notifications and prior approvals are mandatory for most procedures.

With that said, it seems that an 18.3% premium increase, or any increase for that matter, is totally unwarranted.

Sincerely,



NYS Department of Financial Services
Health Bureau – Premium Rate Adjustments

RECEIVED
JUN 30 2014
HEALTH BUREAU
N.Y.C. OFFICE

[REDACTED]

NAME OF INSURER – Empire HealthChoice HMO inc

Empire benefit plan – [REDACTED]

Individual coverage
[REDACTED]

June 25th 2014

To Whom it may concern.

I am writing to submit comments in response to a letter dated June 18th 2014 from Empire Blue Cross, stating that they have submitted a request with DFS to approve a rate increase to my premium of \$620.69 by 18.4% in January 2015.

To say that I am beyond outraged at this is an understatement. I chose Empire BCBS via the Affordable care act, NY State market place. From the moment my coverage started Jan 1st 2014..... I have had nothing but stress, incompetence, stalling, emotional and physical upset, disgusting customer service, appalling communications and overall, the most terrible experience I have ever had with any company in my entire life.

I have very advanced Rheumatoid Arthritis. I had been on a specialty drug called Actemera for years.... And chose this plan , a platinum plan, more expensive than all the rest, to ensure I would be able to keep getting my monthly IV infusion of this drug. Empire BCBS have denied me this drug twice , since January.....not only causing me to end up bed ridden, crippled and unable to function or move....but have caused unspeakable stress on me, in their perpetual resistance and stalling of approving this drug...and paying the specialty pharmacy they allocate to ship this drug out.

My doctors office, [REDACTED] and [REDACTED] [REDACTED] are all besides themselves with frustration, anger, upset, hours and hours spent trying to get through to anyone in this organization that can help, that can oversee, that can offer any assistance whatsoever. They are so incompetent that the new pcp doctor I had to choose from their own list of network doctors....they disapproved her, causing no end of issues and then realized their own stupid mistake.

After not allowing me to have my drug the first time.....which ended up as I said, crippled in bed because I needed my infusion.....and then approving...then changing

their minds again in May.....changing specialty pharmacy.....then approving it.....then refusing to pay the specialty pharmacy for the drug.....again, stalling , and after my own personal calls and letters to the Grievances and Appeals department who NEVER return my calls....or put me through to anyone that can help.....I believe this insurance company to be acting like criminals and crooks. I have received my infusions finally....but payment for them is still an ongoing dispute.....even after we received authorization confirmation letters and references.

With that all in mind, and that it is ONLY 6 months since the beginning of this affordable care act, and NY state market place.....for them to ask for an 18.4% increase in my premium, which is already so high, at \$620 a month, which I pay on time monthly , its beyond appalling, unjust and down right disgusting

These are my comments on this

Sincerely



[REDACTED]

NYS Department of Financial Services
Health Bureau – Premium Rate Adjustments

[REDACTED]

June 27, 2014

RECEIVED

JUN 30 2014

HEALTH BUREAU
N.Y.C. OFFICE

Dear NYS Department of Financial Services,

I am enclosing a copy of the Empire BlueCross BlueShield letter I received regarding the proposed rate increase.

I am insured by Empire HealthChoice HMO, Inc.

[REDACTED]

I have individual coverage

[REDACTED]

I am strongly opposed to such a large hike in my premium which may cause me to cancel and pray that I do not get sick until I reach 65 in 3 years and 3 months from now. I was paying about half of what I am paying now for hospital coverage before January 1, 2014. I had to file a complaint with DFS because Empire automatically debited me for a higher plan than I wanted due to an error on their part. It took months to correct I thank DFS for getting involved. A small suggestion to keep rates lower would be to allow electronic billing saving the need to send a paper bill each month I understand this saving would not cover the entire increase but maybe you should look into management and see if they truly are being paid correctly and making the right decisions to keep costs down.

I hope you consider my objection to this large increase before making a decision.

Respectfully,

[REDACTED]



One Liberty Plaza

[Redacted]

[Redacted]

UN0029257



RECEIVED

JUL 02 2014

HEALTH BUREAU
N.Y.C. OFFICE

Health Insurance Oversight System (HIOS) identification number: [Redacted]

Notice of proposed premium rate change

[Redacted]

I absolutely cannot afford to pay another penny to Empire for my Health Insurance. I am not working - not collecting SS or disability! I will cont. to pay only [Redacted]

June 18, 2014

Thank you. [Redacted]

[Redacted]

Dear Melanie Cohen:

We have filed a request with the New York State Department of Financial Services (DFS) to approve a change to your premium rates for 2015. New York Insurance Law requires that we provide a notice to you when we submit requests for premium rate changes to DFS.

DFS is required by law to review our requested rate change. DFS may approve, modify or disapprove the requested rate change.

Proposed premium rate change

Your current monthly premium is: [Redacted]

If approved, the percentage change to your premium is 18.4%.

If you enrolled through New York State of Health, the state's health plan marketplace, and you qualified for financial assistance, called an Advanced Premium Tax Credit (APTC), your current premium is less than the amount shown above. If you qualify again next year, your rate will continue to reflect the APTC. New York State of Health will calculate your eligibility for financial assistance each year.

Please note that while we try to provide you with the most accurate information possible, the final rates may differ based on the benefit plan design and other features you select on renewal. Also, the final, approved rate may differ because DFS may modify the proposed rate.

Why we are requesting a rate change

These are the main reasons we are requesting a rate increase:

- Our 2015 rate filings reflect the rising cost of medical care, a new pool of customers, our new provider networks, and changes to taxes, fees and the federal transitional reinsurance program.
- More benefits are available to more people.
- In 2015 there will be coverage and benefit changes to most plans, including:
 - Inclusion of, or changes to, Pediatric Dental benefits.
 - Cost-sharing changes, such as deductible, copays, coinsurance, or out-of-pocket maximum for hospital and doctor services and prescription drugs.

[Redacted]

To Whom It May Concern:

My name is [REDACTED] I have recently received a letter from my health insurance, Empire blue cross, blue shield, stating that they have filed the New York Department of Financial Services to raise my premium rate in 2015 by 17%. (See letter attached) The rate I pay now is \$266.52, which is subsidized thanks to the help of the New York State of Health, the state's health plan marketplace.

The reason I am writing you is to address the issues of my premium rising. I am twenty-six years old, I don't have any health issues, nor any major surgeries that are needed. If you need a report from my regular primary doctor, I will be more than happy to mail you one.

I am a freelancer working in the film industry, and work is not always steady. Income comes in on many different patterns, and it often becomes hard to deal with payments when work is slow or waiting on money.

I appreciate the time you took to read my letter and consider my comments on this issue. If you need any additional information, please don't hesitate to ask. Please review my situation. Thank you.

Sincerely,

[REDACTED]

RECEIVED
JUL 02 2014
HEALTH BUREAU
N.Y.C. OFFICE

①

7-1-2014

NYS Dept. of Financial Services
Health Bureau - Premium Rate Adjustments



RECEIVED
JUL 07 2014
HEALTH BUREAU
NYC OFFICE

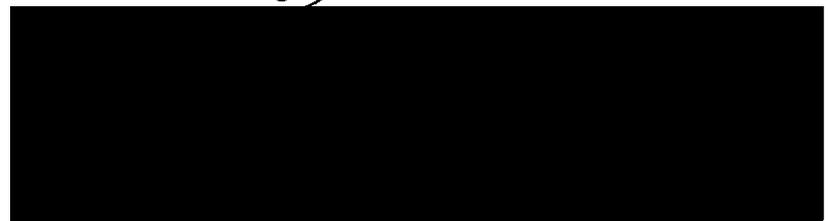
To Whom It May Concern:

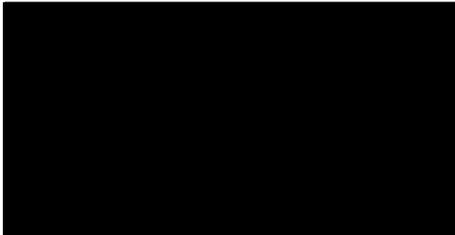
My understanding is that the  has no benefits and is a catastrophic policy in the event of major hospitalization.

The current economy will not support an increase of 61 dollars per month.

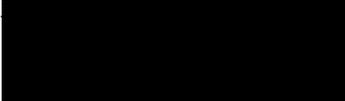
As an aside, the inability of individuals to deduct the premium as an expense like corporations is unfair.

Sincerely,





* Empire / NYS Department of Financial Services
One Liberty Plaza Health Bureau - Premium Rate Adjustments



RECEIVED

JUL 02 2014

HEALTH BUREAU
N.Y.C. OFFICE

To Whom It May Concern:

You have recently reviewed my insurance premium and decided to lower my discount thus raising my premium. At the time of my application, I provided all information that was required, including my exact income. Apparently the agent did not do the math but used a casual guess for their recommendation. I was asked if I believed I made the same amount as I did the previous year and I said yes. I wasn't sure but did not think it would matter as I provided my income information to them in addition to my guess. Regardless, I chose a plan that I could afford and all was well until I called to inquire in an even cheaper policy. I am a single mother trying to rebuild my life and my funds are very limited. I cannot pay the extra for this policy! Please consider honoring the original agreement until November when I can choose a more affordable plan. Thank you for your consideration in this matter. I can be contacted at [redacted] or the above address. I will continue to pay the original premium until I hear from you.

Sincerely,



cc: *

INSURER EMPIRE HEALTH CHOICE HMO, INC.
Benefit Plan EMPIRE
Individual Coverage



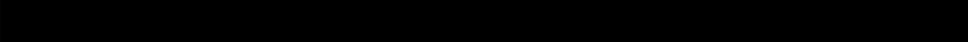


NYS Department of Financial Services
Health Bureau -- Premium Rate Adjustments



RECEIVED
JUL 07 2014
HEALTH BUREAU
N.Y.C. OFFICE

To Whom it May Concern,

My name is  I currently have individual coverage with Empire Health 

I am writing this letter in regards to the proposed premium rate change of 18.5%. As is, my Empire Health Plan is unaffordable. I am currently unemployed due to medical conditions and have been denied disability thus far in New York State. Prior to 2014, I was able to obtain an affordable health care plan with Empire through Healthy New York and was very satisfied with my level of care. Since the Affordable Care Act passed, I have lost several Doctors (as they no longer accept Empire) and I am seriously struggling to pay for my monthly premium as well as all of my medical bills. If this rate change passes, I will have no other option but to cancel my health care plan and I am uncertain as to whether I would be able to afford any other individual plan under the new system.

Please do not pass this premium rate change. I am in a desperate enough situation.

Sincerely,





NYS Department of Financial Services
Health Bureau – Premium Rate Adjustments



RECEIVED

JUL 07 2014

HEALTH BUREAU
N.Y.C. OFFICE

In reference to request of premium rate change submitted to DFS by Empire HealthChoiceHMO, Inc. for plan Empire [REDACTED], which is an individual coverage; HIOS ID [REDACTED]

Dear NYS Department of Financial Services:

I received a letter from my health insurance provider Empire Bluecross Blueshield informing me, that they had submitted a request to DFS to approve a change to my premium for 2015. Reading the content of mentioned letter I have a strong conviction that this request is entirely erroneous.

First of all Empire requests premium increase of 18.3% which is a very big change concerning that I have just selected this insurance plan this year during open enrolment period on NY Exchange website. So premium was lately calculated and I would not have chosen this plan if it was 18.3% more expensive.

Secondly Empire's explanation of this request are not applicable (in most) to my particular policy or not sufficient. Insurer explains that:

- 2015 rate filings reflect the rising cost of medical care, a new pool of customers, new provider networks, changes to taxes, fees and the federal transitional reinsurance program.
- More benefits available to more people.
- In 2015 there will be coverage and benefit changes to most plans, including:
 - Inclusion of, or changes to, Pediatric Dental benefits.
 - Cost-sharing, such as deductible, copays, coinsurance, or out-of-pocket maximum for hospital and doctor services and prescription drugs.

Please be informed that I have an individual plan and I should not be liable for new pool of customers that my insurer gains – they should pay their premiums, am I right? Rising cost of medical care is not explained further, Insurer does not provide any detailed data, how much the costs rises.

Why should I ever pay for what my Insurer calls "more benefits available to more people"? I still have individual plan, I cannot afford to pay for others.

JM

July 5, 2014

Page 2

I do not have kids and so pediatric dental care does not apply to my insurance policy. I was also not informed by Insurer so far about any changes to my deductible, copays, coinsurance or out of pocket maximums reflecting my policy.

Also all the explanations are very general, not specified to my particular case. But there is a specific, very high proposed increase to my premium.

I think this request should be entirely disapproved by DFS as it is not unfair and wrongly explained.

Sincerely,

A large black rectangular redaction box covering the signature area.

Enclosure:

A black rectangular redaction box covering the enclosure information.

RECEIVED
JUL 07 2014
HEALTH BUREAU
N.Y.C. OFFICE

My husband and I had coverage from empire health choice assurance inc from 8/13/11 until obama care canceled our coverage on 1/1/14. We were very satisfied with this plan. Our premiums were \$421.15 per month or \$5053.80 annually. There was no deductible and we were covered 100% hospitalization and ER. Now we are being forced into a plan which we can not afford. Our premiums are now \$1,025.00 a month or \$12,300.00 annually. This plan has a \$6,500.00 family deductible. That is an increase of \$603.85 monthly or \$7,246.20 annually plus a \$6,500.00 increase in deductible. (Affordable Health Care for Who?) I am now paying \$18,800.00 for a useless plastic card. It would take an awful lot of doctor visits to reach \$18,800.00.

Annual income from wages:

[REDACTED]

[REDACTED]

EXPENSES:

Legal Promissary Note
Health Insurance 2014
Real estate tax
Home Insurance
College Tuition
Electric bill
Some expenses

[REDACTED]

[REDACTED]

[REDACTED]

We have 3 children living at home with us. One of which is in college and we are also supporting. The other two are out of college and fortunately have jobs. We both are working 2 part time jobs that don't offer health care to part timers. A 17% increase will be devastating to us. Instead of increasing premiums why don't the insurance companies try to negotiate with the doctors, hospitals, and pharmacies to lower their prices? This would help many people who have high deductibles afford out of pocket medical expenses. It is very easy to just raise rates of struggling Americans, how about working towards a better solution?

Please for the sake of struggling Americans forced to have medical coverage do not allow the insurance companies to increase rates at this time. Force them to find a better solution for their financial problems.

With regards,

[REDACTED]

6/30/14

Empire Health Choice HMO inc
Individual Plan

[REDACTED]

Date: 6-27-14

NY State Department of Financial Services
Health Bureau – Premium Rate Adjustments

RE: Name of Insurance Company Plan [REDACTED]

Type of Plan: (List HMO, EPO, etc)

Indicate if it is an Individual Plan or Group Plan *Empire BCBS Individual*

Health Insurance ID# [REDACTED]

To Whom It May Concern:

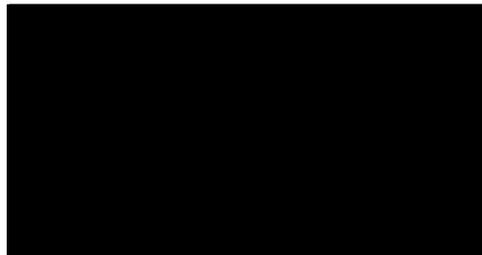
I am writing this letter to express my concerns about the premium changes requested by my insurer. If approved this increase would (fill in reasons why you oppose or support the rate change).

oppose - we are on fixed income

Thank you for your consideration in this manner.

Sincerely,

Consumer Name
Address:
Phone#:
Email Address:



RECEIVED
JUL 07 2014
HEALTH BUREAU
NYC OFFICE

[REDACTED]

NYS Department of Financial Services
Health Bureau – Premium Rate Adjustments

[REDACTED]

RECEIVED
JUL 07 2014
HEALTH BUREAU
N.Y.C. OFFICE

To Whom It May Concern:

I am [REDACTED] my insurer is Empire HealthChoice HMO, Inc. I have individual coverage, my HIOS is [REDACTED]

I received a letter stating that my premium insurance rate has been submitted for a rate increase of 10.8%. My current monthly premium is \$425.39. I am writing this letter to dispute my rate increase and ask that you *not* increase my premium, especially since my coverage is minimal. My policy is for individual coverage with no dental or eye coverage, and minimal laboratory coverage.

I thank you for your time and consideration with my request.

Sincerely

[REDACTED]

RECEIVED

JUL 07 2014

HEALTH BUREAU
N.Y.C. OFFICE

Date: 6-27-14

NY State Department of Financial Services
Health Bureau – Premium Rate Adjustments

[REDACTED]

RE: Name of Insurance Company Plan (Include whether it is
Type of Plan: (List HMO, EPO, etc)
Indicate if it is an Individual Plan or Group Plan
Health Insurance ID#

[REDACTED]

To Whom It May Concern:

I am writing this letter to express my concerns about the premium changes requested by my insurer. If approved this increase would (fill in reasons why you oppose or support the rate change).

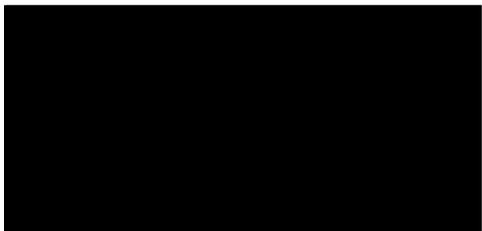
I oppose an increase because I am on a Fixed Income. The workplace does not hire people in their 60's!!!!

Thank you for your consideration in this manner.

Sincerely,

Consumer Name
Address:
Phone#:
Email Address:

[REDACTED]



July ~~RECEIVED~~

JUL 07 2014

HEALTH BUREAU
N.Y.C. OFFICE

NYS Department of Financial Services
Health Bureau - Premium Rate Adjustments



Dear Sir/Madam:

My name is [redacted]. The purpose of this communication is to protest, in the strongest possible terms, the proposed premium rate increase discussed in a document I received via US Postal Mail dated June 18, 2014. Said mailing was endorsed by [redacted]. Said document informed the insured (myself) that comments, if any, were to be sent to the DFS no later than July 18, 2014. Also, before proceeding with my comments/allegations, I understand that the following information is required by the DFS:

MY INSURER: Empire HealthChoice HMO, Inc.
CURRENT PLAN: [redacted]
PLAN TYPE: Individual Coverage
HIOS Identification Number: [redacted]
CURRENT MONTHLY PREMIUM: \$384.34
PROPOSED INCREASE: 18.3% (effective January 1, 2015)

Before proceeding to the discussion, I believe the presentation of a certain amount of my personal history would be enlightening to the DFS.

For many years, I have worked as an Adjunct Assistant Professor of Chemistry in the Life Science Department of New York Institute of Technology - Old Westbury Campus. Note that, as a part-time employee, I am not entitled, under current NYIT policies, to receive the same "fringe benefits" as full-time faculty and staff receive. In fact, the high cost of health insurance is precisely why many universities such as NYIT opt for high numbers of adjunctive faculty as opposed to full-time employees.

Thus, President Obama, mindful of such modern economic realities and similar employment situations, championed the Affordable Care Act and included an Individual Mandate through potential tax penalties which compelled me to subscribe.

Note however, that I did not apply for, nor did I receive, any subsidy / Advanced Premium Tax Credit. Thus, I am currently paying the full premium of \$384.34 per month.

The manner in which I did apply was as follows. On Wednesday, November 6, 2013, I proceeded to www.empireblue.com. Although it would have been possible to apply electronically using website forms, I declined to do this. A perfectly valid

alternative was supplied at www.empireblue.com. One had the option of downloading a health insurance application form as a PDF file, printing it out, completing said application, and finally mailing it via US Postal mail to a BlueCross BlueShield office located in San Antonio, TX. This application was rather lengthy and complex and was twelve pages in length. I carefully completed it, proofread it, endorsed it, made all required financial arrangements, and then mailed this application from the Bellmore, NY Post Office at 4:17 PM on Wednesday, November 6, 2013. My understanding is that it was received by BlueCross BlueShield in Texas shortly thereafter.

Although it is true that ultimately I was enrolled in the plan "Empire Essential GuidedAccess w/HSA (cdib)" effective January 1, 2014 and eventually received all relevant materials from Empire, I found communicating with Empire and also receiving these materials a very slow and difficult process (as did many others). These difficulties were probably caused by Empire's failure to hire enough employees to handle the influx of applications during the latter part of 2013. Please find enclosed a "Newsday" article dated Tuesday, February 4, 2014 documenting the serious problems potential customers were having at that time with Empire BlueCross BlueShield. However, since this is not the objective of my current comments, why am I documenting this "ancient history"? My point is simply that, despite its tremendous prestige, reputation, and wealth, I no longer believe that the venerable Empire BlueCross BlueShield is the wonderful, efficient, humane, and ethical business organization that I had previously falsely conceptualized it to be.

Despite the assertions of President Griffin, the proposed premium rate increase of 18.3% (effective January 1, 2015) is completely wrong-headed. Yes, most products and services will see a rate increase in 2015. But how many will increase by an outrageous 18.3%?

At this point, you are probably expecting me to accuse, with much justification, [REDACTED] of unconscionable avarice, but not so! In my humble opinion, his diabolical proposal **goes far beyond that.**

I am a single Caucasian male of somewhat advanced age (60 years). By the grace of God, I do not yet have any "pre-existing conditions" (but many others do, and according to current laws may no longer be barred from medical insurance).

While President Griffin may be amoral, he is certainly no fool. The probabilities of actuarial science indicate to him that insuring people of my background is potentially "too dangerous" and "too expensive" for his "bottom line".

Unfortunately from his perspective, the Affordable Care Act **requires him to do precisely that.** [REDACTED] He will propose a fantastic rate increase for 2015, which if approved by DFS he hopes will "price out of the market" people such as myself. That is, we will be financially pressured to abandon our individual health insurance policies, possibly running to the emergency room of a local hospital if subsequently overtaken by illness, since we would no longer be insured.

I thought the purpose of the Affordable Care Act was to prevent scenarios like that! Therefore, I am convinced that the only ethical and practical course of action for the NYS Department of Financial Services is to severely reduce [REDACTED] horrific and anti-patriotic premium rate increase proposal.

Sincerely

[REDACTED]

July 1, 2014

NYS Department of Financial Services
Health Bureau – Premium Rate Adjustments

RECEIVED
JUL 07 2014
HEALTH BUREAU
N.Y.C. OFFICE

Dear Financial Services Health Bureau,

I've just learned that my insurance provider, Empire HealthChoice HMO, has requested at 13.2% premium increase for individual policies in 2015. I *strongly urge you not to comply* with this request.

It's a terrible irony that Empire is requesting such an increase even as it fails its individually insured customers again and again. It notified us late in 2013 that our current policies would be discontinued – but had no system for helping us find replacement plans. We were required to spend *days* on the phone, trying to track down information that wasn't yet available on line and seemed not to have been disseminated to Empire employees.

Even when we elected plans and paid our initial premiums, we weren't provided ID cards until February, which meant that all medical payments had to come out of our own pockets. They promised to reimburse us for covered payments made during this period, but this did not happen.

But the very worst aspect of Empire's new plans is that very few physicians and hospitals are electing to participate. I have been an individually insured customer of Empire for many years, with an excellent high-end HMO/PPO. All of my Weil Cornell doctors accepted the HMO plan, so that once my premiums were paid, visits incurred only a \$10 copay.

However, only one of my doctors now accepts Empire's new insurance. With great difficulty, I've called Empire several times for names of doctors who accept the plan, but the referrals I've been given are either impractically far away or, when contacted, do not in fact take the plan.

Our co-pays for prescriptions have tripled under the new plan, as have visit co-pays (if you can find a doctor to accept the plan). And the plan does not allow for continuing care with long-time doctors who have been treating a specific illness. For instance, I had cervical cancer several years ago, but am unable to continue seeing the doctor who treated me and has monitored the condition since then.

I am truly outraged at how my health coverage has deteriorated this year. In essence, I don't really have health insurance – even though I pay \$717/month to Empire. Because I can't find doctors who take the insurance, I'm paying all of my medical bills out of my own pocket.

It was be heartbreaking for me and so many other Empire customers if we were to have to pay more next year for non-existent health insurance.

Sincerely,

[Redacted signature]

Receiving this letter is like a devastating blow. I do not have a job and am paying for this insurance out of my mother's and my savings. One month after I have paid over \$1,000 into the insurance I receive notice the rates are going up another \$100 a month. If I pull out now I don't have insurance and I am out over \$1,000 that I can't afford. What kind of large-scale rip-off scam is this? Is what I am thinking and asking myself.

Sincerely,



RECEIVED

JUL 07 2014

HEALTH BUREAU
N.Y.C. OFFICE

6/30/14

To Whom it may concern:

I received a notice of proposed premium rate change in the mail. However, the notice provided no specific info. I would like to know how much more this god forsaken insurance that none of my doctors take, is supposed to increase. I was dropped from my previous insurer BCBS [REDACTED] effective Dec 31, 2013 and automatically put into this policy by them. As none of the doctors that I have been seeing for years will take this insurance, I should therefore be paying "Obamacare" prices, and NOT \$420 month, which IS NOT considered affordable in my eyes. IF physicians won't take it,

→

Then allow me the right to go onto the NYS healthcare website to register for a policy that is truly Obamacare at Obamacare prices. When I called NYS of Health regarding this, they told me that they have put in a complaint and have generated a case for this, yet I have heard back nothing to date.

My insurer is Empire Health Choice HMO. I have individual coverage, My ID is [REDACTED] and the HIOS ID# is [REDACTED]

Please advise.

Sincerely,
[REDACTED]

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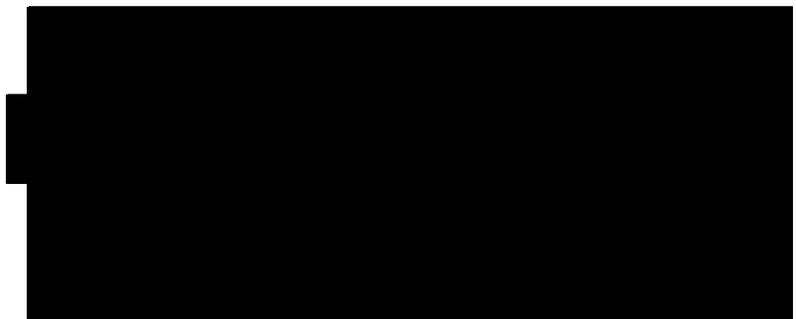
JUL 08 2014

HEALTH BUREAU
N.Y.C. OFFICE

Empire Blue Cross BlueShield

NYS Department of Financial Services
Health Bureau - Premium Rate Adjustments

I will quit my Empire Blue Cross
BlueShield health insurance because
of Medicare Health Insurance from
Oct. 1st 2014.



7/6/2014

July 2, 2014

RECEIVED
JUL 07 2014
HEALTH BUREAU
N.Y.C. OFFICE

NYS Department of Financial Services
Health Bureau—Premium Rate Adjustments

[REDACTED]

Re: Noticed of Proposed Premium Rate Change — [REDACTED]
dated June 18, 2014

Dear Sir/Madam:

I received a letter from Empire Blue Cross/Blue Shield about the proposed premium rate change of up to 18.4% for my Empire [REDACTED] health insurance. I do not approve of any rate hikes to my plan.

I am angry about this proposed rate change. I have been unemployed for about 2 years and will not be able to afford this premium. How can you say that this is affordable health care, if you raise the rates by 18.4%?! That is absurd.

BlueCross and BlueShield should have taken into account the cost of rising medical care in the initial premium rates.

I hereby request that you do not raise any premium rates for my health insurance plan or others. In my case, I probably will not be able to afford it. Then what do I do? Additionally, if I do not have medical insurance, I still get penalized. All around this is not fare to me.

Sincerely,

[REDACTED]

notice of proposed premium
rate change

Empire  GuideAccess

w/HSA cam

Health Insurance Oversight
System (HIOS) ID# 

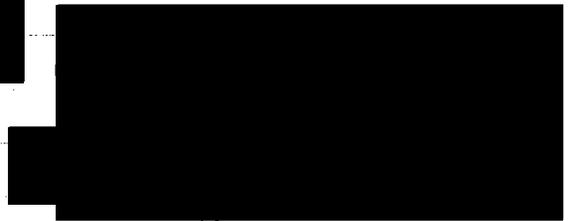
To Whom it may concern:

I recently received a letter ~~sent~~ from Empire about my rate change in the year 2015. I would like to have more information in regards to that change. Our premium now is 361.48 and to change it to 693.84 that's a big hike. I went through New York State Health Plan Market Place, and they gave ~~me~~ us a plan that we could afford. Me and my husband now work parttime. I get ~~some~~ social security retirement.

RECEIVED

JUL 07 2014

HEALTH BUREAU
N.Y.C. OFFICE



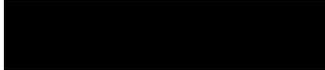
RECEIVED

JUL 07 2014

HEALTH BUREAU
N.Y.C. OFFICE



NYS Department of Financial Services
Health Bureau – Premium Rate Adjustments



Re: Proposed Premium Rate Change/Empire Premier Guided Access w/ Child Dental - cdwc

To Whom It May Concern:

Empire BlueCross BlueShield has requested a 12.6% premium increase for 2015. This is an outrage. To honor this request would be against what the Affordable Care Act represents!

Please keep me posted regarding the outcome of this situation.





To:
Cc:
Bcc:
Subject:

----- Forwarded by [REDACTED] on 07/08/2014 12:01 PM -----

[REDACTED] wrote on 06/21/2014 11:34:44 AM:

> From: [REDACTED]
> To: "PremiumRateIncreases@dfs.ny.gov"
> <[REDACTED]@dfs.ny.gov>, "Sandy Galef"
> <[REDACTED]>
> Date: 06/21/2014 11:34 AM
> Subject: Proposed 18.4% increase to Premium for Empire Silver Level Plan
>
> June 21, 2014
>
> I have Empire Guided Access Silver Level insurance under the NY
> State of Health.
>
> You've gotta be kidding! With the execrable service I have had from
> Empire for the last 6 months, they do not deserve a rate increase.
> Instead, they deserve to be fined or prosecuted by the State
> Attorney General for failing to provide services in the contract.
>
> In northwest Westchester County (Ossining) at the time I had to
> choose a new doctor (because my old doctor and hospital do not take
> Affordable CAre Act patients, no matter what the plan) there were NO
> in-network primary care doctors who also attend at an in-network
> hospital where hospital-based physicians also are in-network. I
> can't afford to pay 100% of a radiologist's bill out of my pocket,
> and the same goes for a hospital bill. I have to travel 34 miles
> round trip to see a Montefiore Medical Group doctor who takes the
> plan and so does Montefiore Hospital. For specialty care, I have to
> travel 47 miles round trip to the main campus of Montefiore in the
> Bronx. And I am grateful to Montefiore for taking me at all.
>
> Unfortunately 911 ambulances in Westchester do not go out of the
> county. So I can't get to Montefiore Hospital if I need an ambulance.
>
> I have filed 6 grievances with Empire and a complaint to the New
> York Attorney General's Health Care Bureau about payment denied for
> services that the Plan Booklet with the word "Contract" on the
> outside says are covered. These services are no-out-of-pocket cost
> annual physical and annual well-woman exams, coverage for shingles
> vaccine which is recommended by the Advisory Committee on
> Immunization Practices for persons over the age of 60, podiatry
> services where the \$50 copay is more than the contracted rate for
> the visit, two prescriptions that I did not get the correct price on
> without filing grievances.
>
> There is no Customer Service number on my health insurance card.
> When I finally got a number to call, I found out the call taker is
> in California, and I cannot call until 11:30am New York time. Then,
> if the question is about a prescription, the matter is referred to a
> second Express Scripts call center in Connecticut. So that cuts
> several hours of availability of the call center for New York consumers.

>
> When I send questions by email through Empire's website the answers
> that come back make me wonder if the person answering has ever
> worked in health care before. For example, one of them told me that
> vaccinations are covered for inpatients. Have you ever heard of
> anyone being admitted to a hospital to get vaccinated?

>
> I am forced to use a mail order pharmacy, and that was not spelled
> out when I chose this plan. I found out on a Sunday afternoon when
> my 3rd refill of blood pressure medicine was declined. I am in the
> process of being reimbursed for the money I paid out of pocket over
> and above the negotiated prescription rate.

>
> I did not receive a health insurance care until January 27, 2014
> even though my application was received by NY State of Health on
> October 29, 2013. Therefore I could not make an appointment with my
> new primary care doctor until February 28, 2014. Because of this,
> payment was denied for a podiatry visit in January, 2014 for lack of
> a referral. You can't get a referral if you don't have a primary
> care doctor, and you can't make an appointment with a new doctor
> unless you have an insurance card.

>
> If Empire wants to cut costs, they can try paying their key
> employees less than a million dollars a year.

>
> I am a very unhappy Affordable Care Act consumer. I strongly advise
> you to deny Empire's request for an 18.4% premium increase, at least
> until they improve customer service and start paying for services
> called for in the "Contract."

>
> _____, urs,

> _____
> Ossining, N

----- Forwarded by _____ on 07/08/2014 12:01 PM -----

NYS Department of Financial Services <portal@dfs.ny.gov> wrote on 06/21/2014
11:51:51 AM:

> From: NYS Department of Financial Services <portal@dfs.ny.gov>
> To: PremiumRateIncreases@dfs.ny.gov,
> Date: 06/21/2014 11:51 AM
> Subject: Prior Approval Submission

>
> Empire HealthChoice HMO, Inc.

>
> individual

>
> hmo

>
> _____

>
> It is a complete outrage and a mockery of the ACA, which has the
> word affordable in it and was explicitly intended to lower costs for
> consumers, to approve a large rate increase before the damn law is
> even a year old. Reasons for requesting a rate increase include,
> 'more benefits are available to more people'. Are you kidding me! No

> one could have predicted that with the passage of the ACA. State and
> federal government has allowed itself to be entirely co-opted by
> corporate interests - anyone working for the state, hired to
> represent the interests of citizens, and whose salaries are paid for
> by their taxes, should be ashamed of colluding with these despicable
> insurance companies. BCBS can't even manage to answer their phones
> or process my payments successfully - they do not need or deserve a
> rate increase in their pockets of their CEO. Don't approve it!
---- Forwarded by [REDACTED] on 07/08/2014 12:01 PM ----

[REDACTED] wrote on 06/21/2014 12:56:43 PM:

> From: [REDACTED]
> To: "premiumrateincreases@dfs.ny.gov" <premiumrateincreases@dfs.ny.gov>,
> Date: 06/21/2014 12:56 PM
> Subject: Health insurance rate increase
>
> To whom it may concern:
>
> My name is [REDACTED] and my insurance info is below.
>
> Empire HealthChoice HMO, Inc.
> Empire Blue Cross Blue Shield Silver Guided Access
> I have individual coverage
> My HIOS ID # is [REDACTED]
>
> I received a letter today that Empire is requesting my rates to
> increase. Please say no to this increase. I work at a small
> preschool as I cannot find a public school job and the insurance
> there is very expensive. The affordable care act required me to buy
> insurance. I was forced to buy a high deductible plan to keep cost
> down and have had to pay for things out of pocket, my sister with
> the same insurance has so far paid about \$2000 out of pocket. Empire
> claims that they need to raise rates to keep up with health care
> costs. Well I need
> to survive. I am unsure if my sister or I can maintain or insurance
> if rates are increased. I appreciate any attention you can bring to
> this matter. Thank you in advance.
>
> [REDACTED]
>
> Sent from m
---- Forwarded by [REDACTED] on 07/08/2014 12:01 PM ----

[REDACTED] wrote on 06/21/2014 02:12:53 PM:

> From: [REDACTED]
> To: "PremiumRateIncreases@dfs.ny.gov" <PremiumRateIncreases@dfs.ny.gov>,
> Date: 06/21/2014 02:13 PM
> Subject: Re: Notice of proposed premium change for 2015 from Empire
> HealthChoice HMO
>
> To Whom it May Concern,
>
> I received in the mail today a notification from my Obamacare
> insurer, Empire HealthChoice HMO, Inc., that they have filed a
> request with your Department for a premium rate increase in 2015 of
> 17%. This is outrageous! I was already forced to buy coverage that I
> did not want for 2014 because my previous, half-as-expensive policy
> was cancelled. Now they want an extra \$56 a month for bare-bones

> coverage. This was supposed to be the AFFORDABLE Care Act. The rate
> of inflation, according to the Social Security Administration is 1.
> 7%. So my health insurer wants an increase of TEN TIMES the rate of
> inflation! This is incredible.
>
> On behalf of myself and the millions of individuals who were forced
> into this health insurance situation through no fault of their own,
> I urge you to deny this outrageous request by my health insurer.
> This will do untold damage to peoples' financial situations, and our
> economy as a whole.

> Sincerely,

> [REDACTED]

> Empire Bronze GuidedAccess [REDACTED] al coverage)
> HIOS identification number [REDACTED]

> Sent from m

----- Forwarded by [REDACTED] on 07/08/2014 12:01 PM -----

[REDACTED] wrote on 06/21/2014 03:12:40 PM:

> From: [REDACTED]
> To: <premiumrateincreases@dfs.ny.gov>,
> Date: 06/21/2014 03:12 PM
> Subject: Premium rate increases by Empire Healthchoice HMO, INC
>
> I was informed that Empire HealthChoice HMO, Inc has requested a 18.
> 4% premium increase for 2015.
> I have the Empire Platinum GuidedAccess ceaf plan, individual
> coverage for my wife and myself.
> My HIOS identification number is [REDACTED]

> I am writing to express my disapproval of this outrageous increase.
> Rate increases of this
> nature are only to benefit the executives of Empire BlueCross
> BlueShield. This number is
> way above any inflationary figures. My opinion is for the NYS
> Department of Financial Services,
> DFS, to deny any increases in 2015 by Empire. Please force the
> Empire company to look
> within their own business model to offset any increases to the
> general public or to at least
> keep the increases in-line with the present minimal inflationary
> numbers that prevail.

> Thank you, [REDACTED]

----- Forwarded by [REDACTED] on 07/08/2014 12:01 PM -----

[REDACTED] wrote on 06/21/2014 04:04:32 PM:

> From: [REDACTED]
> To: <premiumrateincreases@dfs.ny.gov>,
> Date: 06/21/2014 04:04 PM
> Subject: Comments on Rate Increase from Empire BCBS
>
> Re: Empire HealthChoice HMO, Inc.
> Empire Silver Guided Access cbjy
> Individual Coverage

> HIOS [REDACTED]
>
> I'd like to start by noting that this is the first year into a new plan
> and there were many unknowns. Nevertheless, there are a couple of issues
> with this rate change -- an increase of 18.4% -- that are troubling.
>
> Most important is that from what I can tell, no real change has been
> made in the health care system. It is still a third party system based
> on a cover charge (monthly premium) that is very large relative to
> voluntary per visit costs. That means that since each insured already
> has paid the monthly fee, there is great incentive to use as much
> service as possible since the marginal cost of doing so is so low (i.e.,
> the co-pay).
>
> With such a system, every one of the three parties (insured, insurance
> co and doctor) has an incentive for action that causes rates to rise.
> That is, doctors have an incentive to raise their rates. Insurance
> companies pass that on via raised monthly premiums (rather than raised
> co-pays) and insureds seek to get some value for their high monthly rates.
>
> It is easy to see how this is failing us. Instead, I suggest making
> available catastrophe level insurance that covers costs based on income
> (and includes assets in some way). It is far nobler to ensure that no
> family goes bankrupt due to health issues. The health issues are bad
> enough. The second part of that equation would be to make doctors fees
> transparent and to have low cost buying co-ops (theoretically like HMOs
> but effective).
>
> Regarding this specific rate hike, there should be no rate rise based on
> pediatric anything. The notice states that changes will be made due to,
> among other things, Pediatric Dental benefits. In NY, most pediatric
> insurance is done via Child Health Plus. My kids are not on this policy
> and no rate hike should be associated with this.
>
> I'd also like to see NY DFS say no to Empire simply to stop the endless
> circle of rising premiums which cause increased usage and which lead to
> rising doctor's rates. Which then lead to rising premiums ...
>
> Regards,
> [REDACTED]

[REDACTED] by [REDACTED]

NYS Department of Financial Services <portal@dfs.ny.gov> wrote on 06/21/2014
04:37:00 PM:

> From: NYS Department of Financial Services <portal@dfs.ny.gov>
> To: PremiumRateIncreases@dfs.ny.gov,
> Date: 06/21/2014 04:37 PM
> Subject: Prior Approval Submission
>
> Empire HealthChoice HMO, Inc.
>
> individual
>
> hmo
>
> [REDACTED]

[REDACTED]

>
> [REDACTED]
>
> The Affordable Care Act was suppose to make healthcare AFFORDABLE!
> I've had my coverage less than six months and the insurer is
> requesting a "change" (I assume it is an increase) in premiums of
> 18.5%. They also warn that cost sharing changes will take place.
> This increase(again I assume an increase) will create a financial
> hardship to the point that I again may be without medical insurance.
> I do not receive a tax credit so I pay a premium of \$518. plus cost
> sharing amounts for the Gold Plan. Switching to a bronze plan is not
> feasible because the cost sharing amounts are unaffordable. I have a
> preexisting condition but have not been able to have medical needs
> related to this condition paid for by the insurer. I feel that we
> were sold an "introductory type premium" to get people to sign up
> and now that we are enrolled the "real" costs burdens are being
> place on the participants with increases. The scary and distrubing
> feeling is what will happen in subsequent years? I cannot comprehend
> how in such a short time the insurers are looking for an very large
> incese Can you please justify their being able to lay this onerous
> financial burden on us who can least afford this. I feel let down by
> the people I voted to represent and protect me as a citizen of this
> state and country. How naive I am. I respectfully request Empire
> Blue Cross be denied this incese. Let them share the financial
> burden for their greed and at the same time low balling the prems to
> only increase once we are in. Eventually, less and less people will
> be able to afford and the whole ponzi scheme will collapse.

[REDACTED] Empire Gold Guided Access member HIOS

----- Forwarded by [REDACTED] on 07/08/2014 12:01 PM -----

NYS Department of Financial Services <portal@dfs.ny.gov> wrote on 06/21/2014 08:20:28 PM:

> From: NYS Department of Financial Services <portal@dfs.ny.gov>
> To: PremiumRateIncreases@dfs.ny.gov,
> Date: 06/21/2014 08:20 PM
> Subject: Prior Approval Submission
>
> Empire HealthChoice HMO, Inc.

> individual

> hmo

> [REDACTED]

> [REDACTED]

> [REDACTED]@ [REDACTED]. [REDACTED]

> i have just started 4/1/2014 buying my own insurance via obamacare,
> i am 64 and pay my own premium it is outrages for an increase this
> soon and 17.9% is unreal did your rates increase this amount my
> salary did n 2% thank you

----- Forwarded by [REDACTED] on 07/08/2014 12:01 PM -----

[REDACTED] wrote on 06/21/2014 11:56:55 PM:

> From: [REDACTED]

> To: [REDACTED] creases@dfs.ny.gov>
> Cc: [REDACTED]
> Date: 06/21/2014 11:57 PM
> Subject: Questions HIOS ID [REDACTED]
>
> Questions HIOS ID [REDACTED]
>
> Insurer: Empire HealthChoice HMO, Inc
> Plan: Empire Silv [REDACTED] bnz
> Name of insured: [REDACTED]
> I have i [REDACTED] rage.
> HIOS ID [REDACTED]
>
> I received a letter indicating rate changes for 2015. I would like
> more information.
>
> What would the new premium be?
> Would I have the same APTC applied?
> When do these changes take affect? I've only had this coverage sinceMay
2014.
> My current premium is \$438.85, with my APTC I pay \$115 a month. What
> would that 18.4% change look like?
> What specific information caused this change to my account?
>
> Please list all information available for me. I would like all details.
>
> Please let me know as soon as possible so I am able to know my
> options and plan in advance for changes. Contact me by email or
> phone with the info below. Thank you.
>
> [REDACTED]
> [REDACTED]
> [REDACTED] on 07/08/2014 12:01 PM ----

NYS Department of Financial Services <portal@dfs.ny.gov> wrote on 06/22/2014
12:50:42 AM:

> From: NYS Department of Financial Services <portal@dfs.ny.gov>
> To: PremiumRateIncreases@dfs.ny.gov,
> Date: 06/22/2014 12:50 AM
> Subject: Prior Approval Submission
>
> Empire HealthChoice HMO, Inc.
>
> individual
>
> hmo
>
> [REDACTED]

>
> Dear DFS: I write concerning a whopping proposed rate increase of
> 18.4% concerning my health insurance plan, Empire Platinum
> GuidedAccess ceaf, Health Insurance Oversight System (HIOS)
> Identification Number: [REDACTED] I received notification of
> such increase on June 18, 2014, via notice sent by Empire BCBS/

> Empire HelthChoice HMO, Inc. ("Empire BCBS"). The increase is
> completely unjustified and should be denied summarily (and if
> possible, Empire BCBS should be required to DECREASE premiums by at
> least 25%, publicly apologize to the people of the State of New
> York, and agree not to seek any further premium increases for at
> least the next ten years beyond those solely keyed to inflation as
> measured by the Department of Labor and/or the Government Accounting
> Office). Empire BCBS completely breached its contractual obligations
> earlier this year in January 2014 through February 2014 by not
> providing its customers with IDs and requested services in a timely
> manner, lying to them over the phone countless times as to
> physicians being "in network" when they were not (and then later
> were), and setting up customers with physicians that they
> purportedly had to see whom they never chose and never even met in
> their lives. Empire BCBS thus effectively ensured that customers for
> at least one month would not receive health care that THEY ACTUALLY
> PAID FOR in advance because nobody knew what was flying. Empire BCBS
> has also been late in reimbursing healthcare providers for claims
> such that certain providers who were once in network have withdrawn
> from same and are no longer dealing with Exchange plans such as
> Platinum GuidedAccess ceaf. In addition, Empire BCBS' policies
> require that customers seek referrals from PCPs to specialists such
> that insureds have to live in pain and misery for days on end (I had
> to wait a week to see an ENT for earwax removal that also ended up
> impairing my ability to work (although, fortunately, not
> permanently, thank G-d)). Insureds should be able to see a qualified
> doctor when THEY WANT and on their terms, especially when they are
> paying over \$1,100.00 PER MONTH on this plan. I also note in support
> of denial of Empire BCBS' request for increased premiums that
> earlier this year, due to the incompetence and negligence discussed
> above, Empire BCBS, in a settlement reached with Governor Cuomo,
> REFUNDED about three weeks' worth of premiums to insureds. Now,
> Empire BCBS seeks to effectively undo the effect of the settlement
> and INCREASE premiums after they have acted in such a disgusting
> manner. The company further implies in its notification that only
> low income New Yorkers have a realistic chance of paying a lower
> premium and that as such, those New Yorkers not receiving the
> Advanced Premium Tax Credit (APTC) can expect to be paying \$1,352.00
> a month for health insurance. There are some mortgages that are less
> expensive on a monthly basis. The purpose of the Affordable Care Act
> is just that: to make quality healthcare AFFORDABLE and to put an
> end to the tyranny of companies like Empire BCBS who "bait and
> switch" customers by: (a) making promises that they do not keep; and
> then (b) seeking to extort more money from their consumers who, by
> entrusting them with the provision of healthcare services, put their
> VERY LIVES in their hands. Health insurance in this country--never
> mind this State--is still failing because companies like Empire BCBS
> get away with this insanity. PLEASE STOP THEM AND STOP THEM NOW. DFS
> is an agency of the People of the State of New York and needs to act
> for them at this time, not to genuflect to Empire BCBS and all of
> the other health insurance companies that are raping your
> constituency of their hard-earned dollars and very lives. Please end
> this madness and do not reward incompetence, stupidity, negligence,
> and corporate greed. Do what we pay you to do with our tax dollars
> and BLOCK THIS INSANE IN _____ves only to harm the People
> of New York

---- Forwarded by _____

NYS Department of Financial Services <portal@dfs.ny.gov> wrote on 06/22/2014
12:54:10 AM:

> From: NYS Department of Financial Services <portal@dfs.ny.gov>
> To: PremiumRateIncreases@dfs.ny.gov,
> Date: 06/22/2014 12:54 AM
> Subject: Prior Approval Submission

> Empire HealthChoice HMO, Inc.

> individual

> hmo

> Dear DFS: I write concerning a whopping proposed rate increase of
> 18.4% concerning my health insurance plan, Empire Platinum
> GuidedAccess ceaf, Heal ersight System (HIOS)
> Identification Number: [REDACTED] I received notification of
> such increase on June 18, 2014, via notice sent by Empire BCBS/
> Empire HelthChoice HMO, Inc. ("Empire BCBS"). The increase is
> completely unjustified and should be denied summarily (and if
> possible, Empire BCBS should be required to DECREASE premiums by at
> least 25%, publicly apologize to the people of the State of New
> York, and agree not to seek any further premium increases for at
> least the next ten years beyond those solely keyed to inflation as
> measured by the Department of Labor and/or the Government Accounting
> Office). Empire BCBS completely breached its contractual obligations
> earlier this year in January 2014 through February 2014 by not
> providing its customers with IDs and requested services in a timely
> manner, lying to them over the phone countless times as to
> physicians being "in network" when they were not (and then later
> were), and setting up customers with physicians that they
> purportedly had to see whom they never chose and never even met in
> their lives. Empire BCBS thus effectively ensured that customers for
> at least one month would not receive health care that THEY ACTUALLY
> PAID FOR in advance because nobody knew what was flying. Empire BCBS
> has also been late in reimbursing healthcare providers for claims
> such that certain providers who were once in network have withdrawn
> from same and are no longer dealing with Exchange plans such as
> Platinum GuidedAccess ceaf. In addition, Empire BCBS' policies
> require that customers seek referrals from PCPs to specialists such
> that insureds have to live in pain and misery for days on end. (In
> this regard, my husband had to wait a week to see an ENT for earwax
> removal that also ended up impairing his ability to work (although,
> fortunately, not permanently, thank G-d)). Insureds should be able
> to see a qualified doctor when THEY WANT and on their terms,
> especially when they are paying over \$1,100.00 PER MONTH on this
> plan. I also note in support of denial of Empire BCBS' request for
> increased premiums that earlier this year, due to the incompetence
> and negligence discussed above, Empire BCBS, in a settlement reached
> with Governor Cuomo, REFUNDED about three weeks' worth of premiums
> to insureds. Now, Empire BCBS seeks to effectively undo the effect
> of the settlement and INCREASE premiums after they have acted in
> such a disgusting manner. The company further implies in its
> notification that only low income New Yorkers have a realistic
> chance of paying a lower premium and that as such, those New Yorkers

> not receiving the Advanced Premium Tax Credit (APTC) can expect to
> be paying \$1,352.00 a month for health insurance. There are some
> mortgages that are less expensive on a monthly basis. The purpose of
> the Affordable Care Act is just that: to make quality healthcare
> AFFORDABLE and to put an end to the tyranny of companies like Empire
> BCBS who "bait and switch" customers by: (a) making promises that
> they do not keep; and then (b) seeking to extort more money from
> their consumers who, by entrusting them with the provision of
> healthcare services, put their VERY LIVES in their hands. Health
> insurance in this country--never mind this State--is still failing
> because companies like Empire BCBS get away with this insanity.
> PLEASE STOP THEM AND STOP THEM NOW. DFS is an agency of the People
> of the State of New York and needs to act for them at this time, not
> to genuflect to Empire BCBS and all of the other health insurance
> companies that are raping your constituency of their hard-earned
> dollars and very lives. Please end this madness and do not reward
> incompetence, stupidity, negligence, and corporate greed. Do what we
> pay you to do with our tax dollars and BLOCK THIS INSANE INC
serves only to harm the People of New York. Sincerely, [REDACTED]

[REDACTED] Forwarded by [REDACTED] on 07/08/2014 12:01 PM -----

[REDACTED] wrote on 06/22/2014 09:06:03 AM:

> From: [REDACTED]
> To: "PremiumRateIncreases@dfs.ny.gov" <PremiumRateIncreases@dfs.ny.gov>,
> Date: 06/22/2014 09:06 AM
> Subject: Empire Healthchoice Premiun Rate Increase
>

> I am a Physician and I have acquired health insurance earlier this
> year through the NY marketplace because my insurance premium thru
> another carrier increased.
>

> My Plan is a follows:
> Empire HealthChoice HMO
> Empire edAccess ceaf
> HIOS: [REDACTED]
>

> The premium for myself, my wife and my one daughter is 1768.97 a
> month. We visit the doctor just about once a year. We find the
> current premium fair, understanding that we pay for the medical
> services of other participants. However a rate increase of 18.4
> percent is outrageous. We barely use any services and we are asked
> to pay even more. As a physician, I am seeing my reimbursement rates
> decrease every year and as a patient I see my premiums rise. Someone
> needs to do the math! I will keep the rest of the comments to
> myself. I will however seriously consider canceling my plan and
> just have coverage for my daughter, it will be cheaper to pay a
> fine..... and pay for my health services in cash!
>

----- Forwarded by [REDACTED] on 07/08/2014 12:01 PM -----

NYS Department of Financial Services <portal@dfs.ny.gov> wrote on 06/22/2014
10:22:47 AM:

> From: NYS Department of Financial Services <portal@dfs.ny.gov>
> To: PremiumRateIncreases@dfs.ny.gov,
> Date: 06/22/2014 10:22 AM
> Subject: Prior Approval Submission

>
> Empire HealthChoice HMO, Inc.
>
> individual
>
> hmo
>
> [REDACTED]
> [REDACTED]
>
> [REDACTED]
>
> Empire is asking for 18% rate increase for 2015. That is an
> outrageous increase for a plan that has barely existed for 1 year.
> Such an large rate increase after such a short period of time would
> be the equi te mortgage loan and should not be allowed.
----- Forwarded by [REDACTED] on 07/08/2014 12:01 PM -----

NYS Department of Financial Services <portal@dfs.ny.gov> wrote on 06/22/2014 10:53:08 AM:

> From: NYS Department of Financial Services <portal@dfs.ny.gov>
> To: PremiumRateIncreases@dfs.ny.gov,
> Date: 06/22/2014 10:53 AM
> Subject: Prior Approval Submission

> Empire HealthChoice HMO, Inc.

> individual

> hmo

> [REDACTED]

> [REDACTED]

> [REDACTED]

> Please do not permit Empire to raise their rates. I pay \$400 a month
> now. I do not qualify for government assistance, because my retired
> income is \$53,000 a year. If the rate is increased, I will not be
> able to afford it. If it is raised, then government assistance
> should be increased to people earning less than \$55,000 a year.
> Universal H er.
----- Forwarded by [REDACTED] on 07/08/2014 12:01 PM -----

[REDACTED] wrote on 06/22/2014 11:02:47 AM:

> From: [REDACTED]
> To: "PremiumRateIncreases@dfs.ny.gov" <premiumrateincreases@dfs.ny.gov>,
> Cc: [REDACTED]
> Date: 06/22/2014 11:03 AM
> Subject: Proposed Premium Rate Increase

> Hello, I am writing you in reference to a letter I have received
> from my health insurance company regarding a proposed 18.4% increase
> in premiums effective Jan 2015.

> This proposed increase seems unreasonable. I understand that

> expenses and the cost of doing business may have increased for
> Empire BCBS but our income has not increased 18.4%. It is very
> unfair to pass on these increases to the consumer. This was
> supposed to be a health insurance plan that was affordable through
> the New York State of Health website. What amounted to a small
> savings in 2014 will not be affordable in 2015 if Empire BCBS is
> granted permission to increase premiums almost 20%. This increase
> will translate to an additional \$175.00 per month. Did EmpireBCBS
> offer a lower premium in 2014 just to get people to sign up with
> them only to turn around and propose a hefty increase for 2015?
> What about 2016, 2017 and so on? Besides the proposed increase in
> premium, the letter from EmpireBCBS states that there will be
> changes to most plans. These may include higher deductibles,
> copays, coinsurance or out of pocket maximums for hospital and
> doctor services and prescription drugs. Higher premiums for less
> coverage and service. This is totally unacceptable and EmpireBCBS
> should not be allowed to do this. The DFS should not approve these
> proposed increases and changes to current plans.

> The following is our insurance information.....

> Name of insurer: Empire Health Choice HMO, Inc.

> Name of Plan: Empire Gold Guided Access

> This is an individual plan p [REDACTED] us

> My HIOS identification # is [REDACTED]

> Please consider the devastating effect on consumers when reviewing
> the rate increases proposed by Empire BCBS.

> Thank you for your consideration in this matter.

> Sincerely,

----- Forwarded by [REDACTED] on 07/08/2014 12:01 PM -----

<costa@innovationbound.com> wrote on 06/22/2014 12:03:55 PM:

> From: [REDACTED]>

> To: <PremiumRateIncreases@dfs.ny.gov>,

> Date: 06/22/2014 12:04 PM

> Subject: S

> Sent by: <[REDACTED]>

> Hi,

> Recently, I received a notice in the mail from Empire that they want
> to raise my rates by 17.1%! I didn't get 17.1% sicker. I didn't get
> 17.1% older. I didn't request any additional services or benefits.
> I'm happy with my health care plan, don't change it!

> Name of my Insurer: Empire HealthChoice HMO, Inc.

> Name of my Plan: Empire Catastrophic GuidedAccess

> I have Individual Cov

> My HIOS id number is [REDACTED]

>

> [REDACTED]

>

> -

> [REDACTED]

----- Forwarded by [REDACTED] on 07/08/2014 12:01 PM -----

[REDACTED] > wrote on 06/22/2014 12:15:41 PM:

> From: [REDACTED] >
> To: [REDACTED] >,
> Cc: [REDACTED] >
> Date: 06/22/2014 12:16 PM
> Subject: Empire to raise premium 18.4%, please deny

> To Whom It May Concern,

> It is hard to imagine that you would get messages from any consumer
> at this address that praise Empire's proposed rate increases.

> Assuming that this email is actually read, I would like to express a
> dissatisfaction with Empire's proposed rate increases and a deep
> concern with the amount of the proposed increase. I implore the NYS
> Department of Financial Services to DENY Empire's request for a rate
> increase and hold them accountable to the people they serve.

> Last year, I took out a "Gold" policy with Empire for a cost of \$1,
> 491.58/month, which at the time I thought to be expensive, but it
> covered the needs of my family. Today I got a notice in the mail
> informing me of an 18.4% proposed rate increase which would bring my
> monthly premium to \$1,766.03.

> To say this is outrageous would be an understatement. The whole idea
> of this exchange was to bring down the cost of medical insurance,
> and thus far I would have to surmise that this has been a complete
> and utter failure. The coverage offered by Empire on their Gold Plan
> is already sub-par as we now regularly get dinged with charges from
> completely routine checkups and doctor's visits that Empire refuses
> to cover. And now they want to raise rates 18%?

> In an true open marketplace we could shop for an alternative as a
> market capitalism solution would dictate. However, while there are a
> number of providers available on the exchange, doctors in our area
> will only deal with Empire. This is an illusion of choice, and now
> that Empire has a lock on the market, they are free to raise rates
> leaving consumers little choice but to acquiesce. This new system is
> more broken than what it replaced - only now Empire truly does have an
empire.

> How many more years of double-digit percent increases must the
> public endure before the government finally puts an end to this
> insanity? The price of our health insurance alone is approaching
> the cost of our mortgage. A couple more years of this and our family
> will no longer be able to reasonably afford health insurance.

> I urge the Department of Financial Services to closely examine
> Empire's proposed rate increase. Empire must clearly lay out how its
> customers will benefit from such dramatic increases and offer
> reassurances that they can get their costs under control so that
> this is not a yearly occurrence.

> Sincerely,

[REDACTED]
----- Forwarded by [REDACTED] on 07/08/2014 12:01 PM -----

[REDACTED] wrote on 06/22/2014 02:54:28 PM:

> From: [REDACTED]>
> To: <premiumrateincreases@dfs.ny.gov>,
> Date: 06/22/2014 02:53 PM
> Subject: Empire 18.5% increase
>
> RE: HIOS # [REDACTED]
>
> Dear Sir/Madam,
>
> Prior to Obamacare, I was paying \$1245/month throughout 2013. With
> the new rate increase request, my cost will be \$1635/month; nearly a
> \$400 increase. We lost our family doctor, our deductibles are
> higher, and the overall experience is extremely time consuming and
> horrendous.
>
> NYS is screwing the residents, making my lifelong residency an
> impossibility to continue here in New York.

> Sincerely,

> [REDACTED]
----- Forwarded by [REDACTED] on 07/08/2014 12:01 PM -----

NYS Department of Financial Services <portal@dfs.ny.gov> wrote on 06/23/2014 10:17:20 AM:

> From: NYS Department of Financial Services <portal@dfs.ny.gov>
> To: PremiumRateIncreases@dfs.ny.gov,
> Date: 06/23/2014 10:17 AM
> Subject: Prior Approval Submission
>
> Empire HealthChoice HMO, Inc.
>
> individual
>
> hmo
>
> [REDACTED]
>
> [REDACTED]
>
> [REDACTED]
>

> I am requesting that there be no increase in premiums for the year
> 2015. I am paying \$957 a month plus high co-pays for myself and
> family members. An increase in premiums will mean financial hardship
> for myself and my family. Maybe Empire could streamline their
> correspondence policy and instead of sending me 10 notices each
> month send one monthly or bi- monthly notice concerning my doctor
> and hospital to saving money.

----- Forwarded by [REDACTED] on 07/08/2014 12:01 PM -----

[REDACTED]@verizon.net> wrote on 06/23/2014 10:50:08 AM:

> From: Gerard Byrne <gjbyrne1@verizon.net>
> To: <premiumrateincreases@dfs.ny.gov>,
> Date: 06/23/2014 10:21 AM
> Subject: Notice of proposed premium rate change ID No.: 80519NY0160132

>
> I just received a Notice of Proposed Premium Rate change for my
> Empire Silver Guided Access. I had just signed up for coverage
> (Empire Silver) two months ago as I just turned 26. Why would there
> be a proposed rate change? I am paying \$393.32 for a plan with a
> \$2200 deductible (not a great plan). For a recent ENT appointment,
> I had to pay every dime of the bill since my deductible hadn't been
> met. I had recently paid \$100 for a prescription for iron pills
> again because my deductible hadn't been met. Except for
> hospitalization for an accident or illness (which I am not
> expecting), I am finding this plan useless. Now I receive a letter
> stating there might be an additional 18.4% increase for this plan.
> I will not be able to afford this increase and will consider
> dropping my health insurance. Please explain this proposal to me.

>
> [REDACTED]
----- Forwarded by [REDACTED] on 07/08/2014 12:01 PM -----

NYS Department of Financial Services <portal@dfs.ny.gov> wrote on 06/23/2014
10:41:51 AM:

> From: NYS Department of Financial Services <portal@dfs.ny.gov>
> To: PremiumRateIncreases@dfs.ny.gov,
> Date: 06/23/2014 10:41 AM
> Subject: Prior Approval Submission

>
> Empire HealthChoice HMO, Inc.
>
> individual
>
> hmo
>

> [REDACTED]
> [REDACTED]
> [REDACTED]

>
> I received a notice indicating a possible raise in 2015 to 620.69. I
> thought th [REDACTED] to be affordable health care. my HIOS
> number is [REDACTED] There is no way I could afford such an
> increase. P [REDACTED] at we can correct this.

----- Forwarded by [REDACTED] on 07/08/2014 12:01 PM -----

[REDACTED] > wrote on 06/23/2014 11:12:27 AM:

> From: [REDACTED]
> To: <premiumrateincreases@dfs.ny.gov>,
> Date: 06/23/2014 10:43 AM
> Subject: Notice of proposed premium rate change ID No.: 80519NY0160132

>
> I just receive a Notice of proposed premium rate change for my
> Empire Silver Guided Access. I had just signed up for coverage
> (Empire Silver) two months ago as I just turned 26. Why would there be
> a proposed rate change? I am paying \$393.32 a month for a plan with
> a \$2,200 deductible (not a great plan). For a recent ENT
> appointment, I had to pay every dime of the bill since my deductible
> hadn't been met. I had to recently pay \$100 for a prescription for
> iron pills again because my deductible hadn't been met. Except for
> hospitalization for an accident or illness (which I am not

> expecting) I am finding this plan useless. Now I receive a letter
> stating there might be an 18.4% increase for this less than adequate
> plan. I will not be able to afford this increase and will need to
> consider dropping my health insurance. Please explain this to me.

> [REDACTED]
----- Forwarded by [REDACTED] on 07/08/2014 12:01 PM -----

[REDACTED] > wrote on 06/23/2014 11:45:38 AM:

> From: [REDACTED]
> To: <PremiumRateIncreases@dfs.ny.gov>,
> Date: 06/23/2014 11:45 AM
> Subject: Increase for 2015

> Dear Sir or Madam:
> My name is [REDACTED]. My insurance Empire HealthChoice HMO,
> Inc recently send me a letter that the rate for my Platinum Guided
> Access ceaf plan should increase by 18.4% for 2015. Now it cost
> \$620.69, but with this treand it will double in about 4 years.
> I keep this plan only for emergencies now, because it is bad. When
> I had COBRA Blue Cross PPO in 2012 I paid less than \$600 and it was
> a real insurance with out -of- network coverage, Vision, without so
> many restrictions that I have now.
> I am agains ncrease.
> Sincerely, [REDACTED]
> membe [REDACTED]
> HIOS [REDACTED]

----- Forwarded by [REDACTED] on 07/08/2014 12:01 PM -----

NYS Department of Financial Services <portal@dfs.ny.gov> wrote on 06/23/2014 11:53:25 AM:

> From: NYS Department of Financial Services <portal@dfs.ny.gov>
> To: PremiumRateIncreases@dfs.ny.gov,
> Date: 06/23/2014 11:53 AM
> Subject: Prior Approval Submission

> Empire HealthChoice HMO, Inc.

> individual

> hmo

> [REDACTED]

> [REDACTED]

> [REDACTED]

> I am writing to comment on a recent (6/18/2014) notification I
> received from BCBS advising me that my health insurance company is
> seeking at 18.4% increase in my health insurance plan rate for 2015.
> 18.4%! This is unbelievable! I mean really folks, we have seen
> almost no inflation this past year and thus almost the entire
> increase is based not on cost factors but on one of two factors--out
> of control insurance companies and out of control health costs. I am
> a liberal and believe in the new plans but this will not help us!
> This only gives fuel to those wanting to dismantle the entire

> system. PLEASE do not allow this to happen. How can anyone on a
> fixed income absorb this (this is not my case, but I am worried
> about this for the elderly around me). There is no way this can be
> allowed. this is just one more way to eliminate what remains of the
> middle class. You have it in your power to say no. Please tie
> increases in premiums to a reasonable formula. but 9-15 times the
> rate of inflation (depending on who's numbers you are using) is not
> reasonable let this happen.

----- Forwarded by [REDACTED] on 07/08/2014 12:01 PM -----

[REDACTED] wrote on 06/23/2014 12:01:18 PM:

> From: [REDACTED] <fabchu10@aol.com>
> To: <PremiumRateIncreases@dfs.ny.gov>,
> Date: 06/23/2014 12:01 PM
> Subject: Letter on rate increase from Empire

>
> I received a Notice of proposed premium rate change from Empire Blue Cross.
> I'm please requesting no rate change for my part of the premium as
> things are pretty difficult just the way they are.
> I wanted to also mention that my wife and I are in very good health
> and still have not made used of Empire health
> insurance at all.

>
>

[REDACTED]

> Email: [REDACTED]

>
> Insurer: Empire Health Choice HMO, Inc
> Empire Sil [REDACTED] ess cdie
> HIOS Id # [REDACTED]
> Individual [REDACTED] nd I.

----- Forwarded by [REDACTED] on 07/08/2014 12:01 PM -----

NYS Department of Financial Services <portal@dfs.ny.gov> wrote on 06/23/2014 12:26:50 PM:

> From: NYS Department of Financial Services <portal@dfs.ny.gov>
> To: PremiumRateIncreases@dfs.ny.gov,
> Date: 06/23/2014 12:26 PM
> Subject: Prior Approval Submission

>
> Empire HealthChoice HMO, Inc.

>
> individual

>
> hmo

>

[REDACTED]

>
> The proposed increase of 18.4% is much too high. Increases should be
> capped at 5% [REDACTED] nefit plan is Empire Silver Guided
> Access, HIOS [REDACTED]

----- Forwarded by [REDACTED] on 07/08/2014 12:01 PM -----

NYS Department of Financial Services <portal@dfs.ny.gov> wrote on 06/23/2014 12:29:52 PM:

> From: NYS Department of Financial Services <portal@dfs.ny.gov>
> To: PremiumRateIncreases@dfs.ny.gov,
> Date: 06/23/2014 12:29 PM
> Subject: Prior Approval Submission
>
> Empire HealthChoice HMO, Inc.
>
> individual
>
> hmo
>

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED] IDORO@AOL.COM

>
> [REDACTED] ELD GUIDED ACCESS PATHWAY
> ENHANCED [REDACTED] HOME PHONE IF I KNEW THAT THE
> RATE WOULD GO UP IN AFTER SIGNING UP I WOULD HAVE NOT JOINED. I WANT
> TO KNOW WHY IT'S BEING RAISED AND WHY DOES THIS EFFECT ME? i WANT TO
> KNOW IF THE AMOUNT OF THE INSURANCE GOES UP DOES THE GOVERNMENT
> ASSISTANT A [REDACTED] LEASE CALL ME AT THE NUMBER LEFT ABOVE.

----- Forwarded by [REDACTED] on 07/08/2014 12:01 PM -----

[REDACTED].com> wrote on 06/23/2014 12:37:53 PM:

> From: [REDACTED]
> To: " [REDACTED] es@dfs.ny.gov>,
> Cc: " [REDACTED]
> Date: 06/23/2014 12:38 PM
> Subject: Health Insurance Rate Change Request
>
> June 23, 2014
>
> To whom it may concern:

>
> I am writing to register a complaint regarding the proposed rate
> change letter I received from my health insurance provider. Empire
> HealthChoice HMO has filed a request with New York State DFS to
> raise my health care premium by 17% for 2015. This is completely
> ridiculous, offensive and unacceptable.
> Amongst other excuses, Empire HealthChoice HMO sites the rising cost
> of medical care, a new pool of customers and the addition of more
> benefits as the reasons for the 17% rate increase. In response to
> this ludicrous reasoning I submit that the cost of my food,
> gasoline, electricity and general living expenses have all gone up
> significantly. Therefore I would like to see my health insurance
> premium reduced by 17%. I propose a compromise - let's meet in the
> middle - and keep my insurance premium the same for 2015.
> I only signed up for health insurance this calendar year, just
> before the ACA deadline. This is the first time I have been able to
> afford health insurance in my adult life. I am a healthy, male non-
> smoker. I can barely afford health insurance as it is. To think
> that Empire HealthChoice HMO can arbitrarily raise my premium, when

> they've had thousands of new customers handed to them on a silver
> platter by the ACA mandate is frustrating. Any rate increase could
> prove to be financially devastating to me and my family. If DFS
> approves the rate increase I will most likely have to cancel my
> policy and rely on wishful thinking and the emergency room for all
> of my health care needs.
> Please feel free to contact me directly at the number listed below
> if you have any additional questions. Thank you in advance for you
> thoughtful consideration to this matter.

> I am sending a copy of this letter to my Representative, both of my
> Senators and the White House.

> Sincerely,

> [REDACTED]
> [REDACTED] cell

> My information:

> Empire HealthChoice HMO
> Bronze GuidedAccess caat
> Individual

----- Forwarded by [REDACTED] on 07/08/2014 12:01 PM -----

NYS Department of Financial Services <portal@dfs.ny.gov> wrote on 06/23/2014
01:27:39 PM:

> From: NYS Department of Financial Services <portal@dfs.ny.gov>
> To: PremiumRateIncreases@dfs.ny.gov,
> Date: 06/23/2014 01:27 PM
> Subject: Prior Approval Submission
>
> Empire HealthChoice HMO, Inc.
>
> individual
>
> hmo
>

> [REDACTED]
> [REDACTED]
> [REDACTED]

> First year into ACA and the insurance companies are already trying
> to price gouge their way back out. Empire wants an 18.4% increase.
> This is a slap in the face to the American people for daring to
> request a change for the better. There should have been a premium
> freeze for the first and second year of the Marketplace or, at
> minimum, a htly in line with the CPI.

----- Forwarded by [REDACTED] on 07/08/2014 12:01 PM -----

[REDACTED] > wrote on 06/23/2014 02:45:03 PM:

> From: [REDACTED]

> To: <premiumrateincreases@dfs.ny.gov>,
> Date: 06/23/2014 02:45 PM
> Subject: Empire HealthChoice HMO, Inc - request for rate increase
>
> Insurer: Empire HealthChoice HMO, Inc.
> Benefit plan: Empire Essential GuidedAccess
> Individual covera
> HIOS ID number: [REDACTED]
>
> To Whom it May Concern:
>
> I'm writing to register my dismay in receiving a notice from Empire
> BlueCross Blue Shield of a requested 18.4% increase in my monthly
> health care premium. Really?? What's the first word in the
> "Affordable Healthcare Act"? I have insurance under the new ACA
> for no more than 6 months and already my insurer is asking for an
> 18% increase?!?! This after millions of new customers have been
> pushed into the "pool" of insured - thus contributing to lining the
> pockets of healthcare insurance companies everywhere?
>
> I protest and hope you will reject this request or, at the very
> least, force Empire to accept an increase that is substantially less
> (single digits?).
>
> What average worker is receiving an 18% increase in salary anywhere today?
>
> Exactly.
>
> Regards,

> [REDACTED]
> [REDACTED]

----- Forwarded by [REDACTED] on 07/08/2014 12:01 PM -----

[REDACTED] wrote on 06/23/2014 02:48:34 PM:

> From: [REDACTED]
> To: <premiumrateincreases@dfs.ny.gov>,
> Date: 06/23/2014 02:48 PM
> Subject: Comment on proposed rate change
>
> Name of Insurer: Empire HealthChoice HMO, Inc.
> Name of Plan: Empire Silver GuidedAccess cbny
> Coverage: Individual
> HIOS Identification #: [REDACTED]
>
> I am writing to comment on the recent notice for a proposed rate
> change. I understand some of the reasoning for an increase however I
> do feel it is a bit ridiculous to expect those enrolled through the
> state's health plan marketplace to welcome the 18.4% increase. With
> my current plan, that equates to an additional \$80/month. Empire
> needs to find other solutions to avoid such steep increases.

> -

> [REDACTED]
----- Forwarded by [REDACTED] on 07/08/2014 12:01 PM -----

[REDACTED] wrote on 06/23/2014 03:16:57 PM:

> From: [REDACTED]
> To: <premiumrateincreases@dfs.ny.gov>,
> Date: 06/23/2014 03:17 PM
> Subject: health insurance rate increase
>
> Empire Healthchoice HMO inc.
> empire platinum giudedaccess
> individu
> HIOS ID [REDACTED]
>
> Hi,
> I just received a letter indicating that Blue Cross is asking for a
> rate increase on my policy of almost 20%.
> I signed onto the exchange health plans, expecting rates to go down,
> not up, so they got me to sign up with a certain price, and now that
> they have me, they are already pushing for a hefty rate increase, I
> hope that you won't fall for this fraudulent claim of reasons that
> they are claiming to raise the rates. Obamacare is a fraud to begin
> with, and this rate increase will help perpetuate this fraud.
>
>
>

----- Forwarded by [REDACTED] on 07/08/2014 12:01 PM -----

[REDACTED] > wrote on 06/23/2014 04:35:05 PM:

> From: [REDACTED]
> To: "premiumrateincreases@dfs.ny.gov" <premiumrateincreases@dfs.ny.gov>,
> Date: 06/23/2014 04:35 PM
> Subject: Rate increses at Emoire Blue Cross Blue Shield
>
> The proposed rate increase of 18.4% for the calendar year 2015 is
> usurious and unjust. We were forced to participate in Obamacare and
> this smacks of BAIT AND SWITCH.
>
> Because this program is so new insurance companies should not be
> allowed to raise their rates at all 0%. If rates are raised, more
> people will drop the program and cause rates to get even more expensive.
>
> This is unjust! The government has a gun to ur head, and the
> insurance companies raise rates!
>
> NO RATE INCREASES ALLOWED IN 2015
>

> Sincerely,
>
>

----- Forwarded by [REDACTED] on 07/08/2014 12:01 PM -----

[REDACTED] wrote on 06/23/2014 04:38:20 PM:

> From: [REDACTED]
> To: "premiumrateincreases@dfs.ny.gov" <premiumrateincreases@dfs.ny.gov>,
> Date: 06/23/2014 04:38 PM
> Subject: Empire Blue Cross Blue Shield
>
> The proposed rate increase of 18.4% for the calendar year 2015 is
> usurious and unjust. We were forced to participate in Obamacare and
> this smacks of BAIT AND SWITCH.

>
> Because this program is so new insurance companies should not be
> allowed to raise their rates at all 0%. If rates are raised, more
> people will drop the program and cause rates to get even more expensive.
>
> This is unjust! The government has a gun to ur head, and the
> insurance companies raise rates!
>
> NO RATE INCREASES ALLOWED IN 2015
>

> Sincerely,

>
> [REDACTED]

> Forgot pertinent info:

>
> Empire HealthChoice HMO, Inc is my insurer.
> plan is Bronze Guided Access
> I have indiv .
> HIOS id# is [REDACTED]

----- Forwarded by [REDACTED] on 07/08/2014 12:01 PM -----

[REDACTED] wrote on 06/23/2014 04:52:29 PM:

> From: [REDACTED]
> To: <PremiumRateIncreases@dfs.ny.gov>,
> Date: 06/23/2014 04:52 PM
> Subject: Empire Rate increases for 2015
>

> Dear Sirs,
> I just received a letter from Empire BlueCross BlueShield announcing
> a request for an 18.3% in rates for 2015.
> I am a semi retired person living on a fixed income and was
> delighted to be able to buy health insurance on the NYState of
> Health Exchange for my wife and myself for \$835 per month. An amount
> I consider manageable but still exorbitant. A request by Empire to
> increase rates after only one year on the exchange by almost one
> fifth is outrageous and inappropriate. I understand some additional
> unforeseen costs as part of the health exchange startup is
> inevitable but this seems way out of line. How much money do they
> have to make????

> I strongly urge you not to accept this proposal and to negotiate a
> more reasonable solution.

>
> [REDACTED]

> -

> [REDACTED]

----- Forwarded by [REDACTED] on 07/08/2014 12:01 PM -----

NYS Department of Financial Services <portal@dfs.ny.gov> wrote on 06/23/2014
06:26:18 PM:

> From: NYS Department of Financial Services <portal@dfs.ny.gov>
> To: PremiumRateIncreases@dfs.ny.gov,

> Date: 06/23/2014 06:26 PM
> Subject: Prior Approval Submission

>
> Empire HealthChoice HMO, Inc.

>
> individual

>
> hmo

>

> [REDACTED]

> [REDACTED]

> [REDACTED]

>

> After six months of being a customer, I believe that Empire should
> not be allowed to raise insurance rates in the state of New York
> until they change their practices. The company makes it impossible
> to comparison-shop with other insurance providers since it is
> impossible to determine in advance what providers accepts this
> insurance and who doesn't. It puts up roadblock after roadblock in
> paying for doctors, prescriptions, and tests, hoping to exhaust the
> patient. It discriminates against the chronically ill by, for
> example, only having 3 physicians specializing in HIV care for the
> whole of New York City, which practices are in Harlem and Bushwick.
> When I contacted their customer service and asked about some of
> these issues, their response was that I could quit and go get health
> care from a [REDACTED] idn't like it.

----- Forwarded by [REDACTED] on 07/08/2014 12:01 PM -----

[REDACTED] <[REDACTED]> wrote on 06/23/2014 07:35:44 PM:

> From: [REDACTED] >

> To: <[REDACTED].ny.gov>,>

> Cc: <[REDACTED]> >

> Date: 06/23/2014 07:35 PM

> [REDACTED] ealth Choice HMO, Inc. Policy # [REDACTED] or

> [REDACTED] Individual Coverage, HIOS ID # [REDACTED]

>

> [REDACTED] Health Choice HMO, Inc. Policy # [REDACTED] for [REDACTED]

> [REDACTED] Individual Coverage, HIOS ID # [REDACTED]

>

> Dear Mr. [REDACTED]

>

> Why are my rates going up 18.5% after 1 year. They already went up
> 20% from the previous year's policy. Have salaries gone up this
> much (40%)? The cost of living? The cost of a gallon of milk or a
> gallon of gas? The answer in no and neither should insurance fees.
> Especially since the quality and quantity of Empire's insurance
> plans have dramatically declined.

>

> It took Empire a whole month to figure out my new policy # and to
> get me a ID card so I did not have coverage most of January. It
> took a whopping 4 months to get the price of my premium right
> (varied by month) and the correct benefits communicated to me! In
> addition, I had to call Empire a dozen or more times to get the
> situation resolved. The Empire staff did not know the answers to a
> number of things and one said one thing and one said another. I had
> to continually call back and speak to supervisors. The staff did
> not know the answers because they were not properly equipped and

> empowered by Empire's management.
> And much more sub par service issues- the list is long..
>
> Shame on Empire for this.
>
> I made a formal complaint and set up a grievance and have yet to be
> responded to after 2 months. This is also unacceptable!
>
> I am hoping to get a proper response and look forward to hearing
> back from you.
>
> thank you.
>
> Best Regards,

> [REDACTED]
> [REDACTED]
> [REDACTED]

----- Forwarded by [REDACTED] on 07/08/2014 12:01 PM -----

[REDACTED] wrote on 06/23/2014 07:59:23 PM:

> From: [REDACTED]
> To: <premiumrateincreases@dfs.ny.gov>,
> Date: 06/23/2014 07:59 PM
> Subject: about rate change
>
> To whom this may concern,
>
> Name of insurer: Empire HealthChoice HMO, Inc.
> Plan: 254
> I have indi
> ID Number: [REDACTED]
>

> I have a question about the rate change that was sent to me by
> Empire Blue Cross Blue Shield dated, June 18, 2014. I am a bit
> confused as to why the rate is going up.
>

> Also, I was not sure if this is what I was going to have to pay
> come January 2015. Please email me ASAP. I was not aware of this
> rate increase, nor will I be paying \$403.92 monthly. That is not
> what I agreed to. If this is what I will have to be paying, I will
> unfortunately have to cancel my insurance plan.
>
>
>

----- Forwarded by [REDACTED] on 07/08/2014 12:01 PM -----

[REDACTED] wrote on 06/23/2014 09:24:42 PM:

> From: [REDACTED]
> To: <premiumrateincreases@dfs.ny.gov>,
> Date: 06/23/2014 09:24 PM
> Subject: Rate Change Proposal from Empire Blue Cross
>
> To whom it may concern:

> I have recently signed up for short-term health insurance for my
> wife through the online ehealthinsurance.com exchange and was

> awarded coverage from Empire Blue Cross, starting on June 1st, 2014.
>
> Despite the fact that our coverage was supposed to start 3 weeks
> ago, we have yet to actually receive the insurance card for my wife,
> even though I have already paid 2 premiums totaling over \$700. Now,
> after less than 3 weeks of "coverage" Blue Cross has sent me a
> letter proposing a 17% increase to my premium. I find this
> outrageous and absurd.
>
> My HIOS ID number is [REDACTED]
>
> I would like to know if there is someone I can speak to about this
> potential rate increase.
>
> Thank you for your time.
>
> regards,
> [REDACTED]

----- Forwarded by [REDACTED] on 07/08/2014 12:01 PM -----

NYS Department of Financial Services <portal@dfs.ny.gov> wrote on 06/24/2014 07:11:01 AM:

> From: NYS Department of Financial Services <portal@dfs.ny.gov>
> To: PremiumRateIncreases@dfs.ny.gov,
> Date: 06/24/2014 07:11 AM
> Subject: Prior Approval Submission
>
> Empire HealthChoice HMO, Inc.
>
> individual
>
> hmo
>
> Sunny
>
> Cover
>
> sunnyrae@optonline.net

> HIOS identification # is 80519NY0160126. Empire Bronze Guided Access
> plan An 18% increase is unacceptable! I thought this was to help
> bring insurance costs down for consumers? This increase is EXACTLY
> the same % changes they were doing before health reform and nothing
> has changed except for the fact that I go online to a marketplace.
> They state the increase is proposed due to more benefits to more
> people, rising medical costs; wasn't that the whole point. If you
> approve these types of price increases we are right where we were
> before with insurance premiums being too expensive to afford. Except
> now we get fined for not putting \$\$ in the insurance companies
> pockets. Th culous!

----- Forwarded by [REDACTED] on 07/08/2014 12:01 PM -----

[REDACTED] wrote on 06/24/2014 08:25:16 AM:

> From: [REDACTED]
> To: <PremiumRateIncreases@dfs.ny.gov>,
> Date: 06/24/2014 08:25 AM
> Subject: Premium Rate Change - An Excuse For Greed Or Inefficiency -
> Take Your Pick

>
> Insurer: Empire HealthChoice HMO, Inc
> Benefit Plan: 254
> I have in _____ age
> HIOS ID: _____
>
> To My Friends At The NYS Department Of Financial Services:
>
> Hello. I am writing you to express my profound disapproval of
> Empire Blue Cross Blue Shield's "Proposed Premium Rate Change".
>
> I have just received their letter and if I am reading it right, I am
outraged!
>
> I am a small business owner in New York City who is in the midst of
> building a small business in a highly competitive field where you
> must find better ways to do business and innovate or disappear.
> This is free market capitalism. This is one of the principal
> reasons why the citizens of the world flock here.
>
> I live in a small 1 bedroom apartment in Long Island City with hopes
> of buying a home someday. The hopes are based on plans- the plans
> are based on hard work, sacrifice and smart decisions- you know the
> drill. After the company and industry I worked for went under in
> the fiscal crises of '08/'09, I went uninsured, paying out of pocket
> for 5 years as I tried to find a new career. Only this past January
> did I finally feel it fiscally possible to commit \$400+ a month to
> coverage as my business has shown signs of growing. And now a few
> months later this nonsense.
>
> I understand that EBCBS is not in an easy business, but they are
> (supposed to be) subject to the same rules as my business- ie. find
> a better way to run your business and serve your customers or disappear
> . They listed their reasons for the rate change. They are NOT
> valid reasons to raise my premium 18.4%. They are reasons for them
> to trim their costs 18.4%!
>
> A modest rate increase of 3,4,5 even 8% I would say, ok it is what
> it is. But almost 20%??? No. Not acceptable.
>
> A final note: One of the reasons they provide for requesting the
> rate change is "More benefits available to more people." Who
> exactly are they referring to? I strongly recommend that they
> DEFINE WHO THESE PEOPLE ARE. They have the stats I assure you.
>
> Please do New Yorkers a huge favor and summarily DISAPPROVE this
> proposed premium rate change.
>
> Deep Thanks For Reading and Considering My Opinion.
>
> All The Best,

> _____
----- Forwarded by _____ on 07/08/2014 12:01 PM -----

NYS Department of Financial Services <portal@dfs.ny.gov> wrote on 06/24/2014
09:57:42 AM:

> From: NYS Department of Financial Services <portal@dfs.ny.gov>
> To: PremiumRateIncreases@dfs.ny.gov,

> Date: 06/24/2014 09:57 AM
> Subject: Prior Approval Submission
>
> Empire HealthChoice HMO, Inc.
>
> individual
>
> hmo
>

[REDACTED]

> I am currently enrolled in Empire Platinum guided access ceaf, id
> 80519ny010136. I recieved a notice of a proposed rate increase of
> 18.4% for 2015. I currently pay \$681.63 per month for my plan. If
> approved, my new premium would go up \$125.41 per month to \$807.05.
> That's over \$1500 per year. I feel that that increase would be
> prohibitive for me to continue with such a policy and would force me
> to switch to another company. I am willing to accept a slight
> increase like 5-7%, but 18% is way out of line. I am asking you to
> reject this proposed increase for 2015.

----- Forwarded by Loreen Lambert/HLT/NYC/SIDNY on 07/08/2014 12:01 PM -----

[REDACTED] > wrote on 06/24/2014 10:02:16 AM:

> From: [REDACTED] >
> To: "premiumrateincreases@dfs.ny.gov" <premiumrateincreases@dfs.ny.gov>,
> Date: 06/24/2014 10:03 AM
> Subject: Rate Increases

> To whom it may concern,
>
> I consider it an outrage that just a few months into the affordable
> care act, citizens have been subjected to a bait and switch. I gave
> up my coverage under COBRA in order to show my support for
> Obamacare, and regret it, as I have fewer choices of doctors at the
> same premium, and now Empire Blue Cross Blue Shield wants to
> increase my premium by an additional almost \$1,200 per year which I
> CANNOT afford as I still have not returned to work full time after a
> year of being unemployed.

> Insurer: Empire HealthChoice HMO, Inc
> Plan: 254
> Individual coverage
> HIOS ID #: [REDACTED]

----- Forwarded by [REDACTED] on 07/08/2014 12:01 PM -----

NYS Department of Financial Services <portal@dfs.ny.gov> wrote on 06/24/2014 10:17:25 AM:

> From: NYS Department of Financial Services <portal@dfs.ny.gov>
> To: PremiumRateIncreases@dfs.ny.gov,
> Date: 06/24/2014 10:17 AM
> Subject: Prior Approval Submission

> Empire HealthChoice HMO, Inc.

> individual
>
> ppo
>

[REDACTED]
[REDACTED]
[REDACTED]

>
> My HIOS ID is [REDACTED] I received a letter stating a proposed
> rate increase of 18%, and I just want to comment that this is
> complete crap. No sooner than I have a policy, the rates go up. I'm
> sure the person reading this is helpless to do anything with these
> comments. B [REDACTED] and have a nice day.

----- Forwarded by [REDACTED] on 07/08/2014 12:01 PM -----

NYS Department of Financial Services <portal@dfs.ny.gov> wrote on 06/24/2014
10:41:23 AM:

> From: NYS Department of Financial Services <portal@dfs.ny.gov>
> To: PremiumRateIncreases@dfs.ny.gov,
> Date: 06/24/2014 10:41 AM
> Subject: Prior Approval Submission

>
> Empire HealthChoice HMO, Inc.

>
> individual
>
> hmo
>

[REDACTED]
[REDACTED]
[REDACTED]

>
> I just received notice that my insurer is requesting to raise my
> policy premium 17.9% which to me is excessive for 1 year. I thought
> the new laws were put in place to prevent this kind of thing from
> happening with insurance compa [REDACTED] lease consider disallowing this
> steep hike

----- Forwarded by [REDACTED] on 07/08/2014 12:01 PM -----

NYS Department of Financial Services <portal@dfs.ny.gov> wrote on 06/24/2014
10:52:56 AM:

> From: NYS Department of Financial Services <portal@dfs.ny.gov>
> To: PremiumRateIncreases@dfs.ny.gov,
> Date: 06/24/2014 10:52 AM
> Subject: Prior Approval Submission

>
> Empire HealthChoice HMO, Inc.

>
> individual
>
> hmo-pos
>

[REDACTED]
>

> [REDACTED]
>
> [REDACTED]
>
> Insurer: Empire HealthChoice HMO, Inc. Plan: Empire Platinum
> eaf Plan type: Individual coverage Plan HIOS ID:
> [REDACTED] I subscribed through the NY Affordable Healthcare Act
> program to this plan only a few months ago. The first two months of
> service were disorganized and sub-par, though now I am generally
> satisfied with coverage. However, I just received notice that the
> insurer is requesting an 18.4% increase in premiums for 2015! The
> notice included no information justifying the increase nor
> documenting how it was calculated. This is supposed to be an
> AFFORDABLE health care act plan and an 18.4% rate increase, after
> only one year, is excessive if not predatory. The absence of
> documentation to support the increase request also makes it clearly
> unjustified. This appears to be an example of a ?bait and switch?
> approach to soliciting business. In what other industry, regulated
> or otherwise, would such a large increase be permitted? This
> increase should not be sanctioned. Particularly after the initial
> months of substandard implementation and with no documentation
> provided to [REDACTED] e premium hike.
---- Forwarded by [REDACTED] on 07/08/2014 12:01 PM ----

< [REDACTED] > wrote on 06/24/2014 10:51:13 AM:

> From: < [REDACTED] >
> To: <PremiumRateIncreases@dfs.ny.gov>,
> Date: 06/24/2014 10:56 AM
> Subject: (no subject)
>
> EMPIRE HEALTH CHOICE HMO INC. Empire Silver GuidedAccess W/HSA
>

> HIOS ID NO. [REDACTED]
>

> I write to implore you to not approve the 2015 rate increase
> requested by Empire of 18.3%.

>
> The Affordable Care Act was supposed to curb premium increases and
> in fact the President stated that premiums would decrease because
> more people would have insurance.

>
> There is no justification for the requested rate increase. Each and
> every year deductibles and out of pocket expenses increase. It seems
> as if these insurance companies don't pay anything until you are out
> of pocket almost \$6,000.

>
> They should cut expenses advertising and overhead before they seek
> any increase at all let alone an 18.3% increase.

>
> Thank you.
>
>
>
>

[REDACTED]

> [REDACTED]
>
> The information contained in this email may be privileged,
> confidential, from disclosure under applicable law, and intended
> solely for the use of the individual or entity named above. If the
> reader of the message is not the intended recipient, or the agent
> responsible for delivery to the intended recipient, you are hereby
> notified that any dissemination, distribution, or copying of the
> message is strictly prohibited. Unauthorized or improper use of this
> information may subject the reader to prosecution to the fullest
> extent of the law. If you have received this communication in error,
> please notify the sender immediately and destroy the material in its
> entirety, w hard copy.

----- Forwarded by [REDACTED] on 07/08/2014 12:01 PM -----

[REDACTED] wrote on 06/24/2014 10:29:57 AM:

> From: [REDACTED]
> To: [REDACTED]
> Cc: <[REDACTED]>
> [REDACTED], <PremiumRateIncreases@dfs.ny.gov>
> Date: 06/24/2014 11:00 AM
> Subject: Proposed Rate Increase

> [REDACTED]
> New York State Department of Financial Services
> New York, NY 10004

> [REDACTED]

> Hello Mr [REDACTED]

> My healthcare company is Empire HealthChoice HMO, Inc. My benefit
> plan is Empire Platinum GuildedAccess ceaf. I have individual coverage,
> my HIOS id # is 80519NY0160136.

> I received a letter dated June 18, 2014, they filed a request with NYS
> Department of Financial Services for approval in 2015 of a premium
> increase of 18.4%.

> I cannot work because I am the sole caregiver for my husband Michael, who
> is on Social Security Disability due to ALS. A rate increase that high
> will be detrimental to our finances.

> In 2014, I received a much-needed, lower health insurance premium through
> The Affordable Care Act, going from \$994.59 per month to \$571.30 per
> month.

> Please do not allow the insurance companies to greedily increase their
> premiums and increase their profits from the rate-payers of New York.
> Please refuse to allow such an exorbitant increase, sending them a strong
> message that the government stands-up for the People of New York.

> Thanking you in advance for your kind attention to this matter.

>
>

[REDACTED]

>
>
>
>

----- Forwarded by [REDACTED] on 07/08/2014 12:01 PM -----

NYS Department of Financial Services <portal@dfs.ny.gov> wrote on 06/24/2014 11:17:11 AM:

> From: NYS Department of Financial Services <portal@dfs.ny.gov>
> To: PremiumRateIncreases@dfs.ny.gov,
> Date: 06/24/2014 11:17 AM
> Subject: Prior Approval Submission
>
> Empire HealthChoice HMO, Inc.
>
> individual
>
> hmo
>

[REDACTED]

>
> This battle is my life at present. I have been writing this letter
> for a month, updating my story as it is unfolding. I have spared you
> the most recent details, but I can tell you, raising my premium,
> which I am already receiving a tax subsidiary on because I am so
> POOR, raising my premium 18.4% when I can't afford to pay it as is
> NOW- IS ABSOLUTELY UNACCEPTABLE. How much does Mr. Brian T. Griffin
> make annually?!?!?! TAKE IT OUT OF HIS DISGUSTING BILLION DOLLAR
> SALARY!!! They have paid for nothing for me, covered NOTHING, and
> they want MORE money?!?!?!? I am a type 1 diabetic, and they want
> me to pay them more money to kill me slowly?! THIS IS CRIMINAL! I AM
> BEGGING YOU TO SEE REASON, TO LOOK AT THIS CORRUPTION, AND SAY NO!
> My waking nightmare: I was on Healthy NY, which was cancelled
> effectively Jan. 1st, 2014. I was not notified this was happening
> until a month after I renewed my insurance plan with Aetna in August
> of 2013. They then expected me to meet my medical supply deductible
> of over \$1,000 (which I was never notified that it even existed) in
> 4 months. They refused to pro-rate it. I am a Type 1 Diabetic on an
> insulin pump. I was on Healthy NY because I work for a non-profit
> art center (Rockland Center for the Arts), barely making it paycheck
> to paycheck. Please don't misunderstand, I love my job and wouldn't
> trade it for another. I also am grateful to have a job I enjoy when
> so many of my peers and family have been unemployed for the last few
> years. However, I got slammed with an \$800 bill from my pump supply
> company. I then was forced onto the exchange, where I thought I was
> choosing the best plan with Empire Blue Cross Blue Shield. They took
> over 2 weeks to send me my I.D. card, forcing me to pay \$87 out of
> pocket for generic antibiotics to treat a sinus infection. Great
> start. Diabetes is an auto-immune disorder and I am lucky to not get
> sick as often as some of my diabetic peers. Since Jan. 1st, Empire
> Blue Cross Blue Shield has denied every single one but 3 of my
> prescriptions. That's 3 out of at least 5! One of the denied
> medications was a generic prescription allergy medication, because I
> otherwise am covered in hives from something as simple as soap (over
> the counter allergy medicine never works for more than two weeks).
> Another denied prescription was for my pre-ulcer condition
> (gastritis). It took 3 months to get that appealed! If I wasn't
> lucky enough to be able to live off samples from my doctor's office,

> I'd have been in the hospital within a week. Have you ever
> experienced a gastritis attack? I've had mothers tell me it's more
> painful than child birth. After being hospitalized for it once, I
> can see how! I am a Type 1 Diabetic, and BCBS seem content to take
> my monthly premium while not providing anything in return! I have
> spent every single day on the phone with them and my doctors'
> offices, fighting for my medications and my new insulin pump, for at
> least 3 months straight. I have now been forced back onto manual
> injections, which means profoundly poorer control over my blood
> glucose levels, which will then destroy my A1C- which is exactly the
> kind of situation that leads diabetics to serious complications or
> even death. It also causes mental health illnesses, such as
> depression, which I am already experiencing due to the wild
> prolonged high blood sugar. Also, this may be more information than
> you want but I need you to understand my physical discomfort as
> fully as you can; prolonged high blood sugars can cause frequent
> yeast infections. Regardless of my reader's gender, I'm sure you can
> understand how one every couple of weeks can really be a nightmare!
> The yeast infections can be painful to the point of searing pain
> when I sit down. My GYN says there's nothing that they can do but
> give me herbal supplements that don't work and to not eat sugar.
> Have you tried to go a whole day without eating *any* sugar? If you
> have, your meals must have consisted of only lettuce and water. This
> effects every aspect of my health. Since I have switched back to
> manual injections, it has taken weeks to get my blood sugar below
> 200 (normal range is 90-120) and even now, it continues to spike in
> the upwards of 330-400. I have stopped eating regularly because it
> seems merely smelling food sends my blood sugar levels soaring. A
> couple of weeks ago, I had to stay awake until 3am (on a work
> night), because my blood sugar would not fall below 400! I was
> afraid that if I fell asleep, I would fall into a coma and die. That
> week I consumed less than 1,200 calories (and zero carbohydrates).
> My blood sugar remained too high regardless. I never had that
> problem, not once, with an insulin pump. I've been on an insulin
> pump since November of 2009. Insulin pumps drastically improve a
> Type 1 Diabetic's quality of life and overall health. I'm 31 years
> old and engaged to be married. If I want to have a child, I have to
> get my Hemoglobin A1C within normal range for 6 months before I can
> even consider trying to conceive. That will never happen without the
> control a good insulin pump provides. So at this rate, my insurance
> company is not only denying me a healthy life, they are now taking
> away my ability to safely have children. How is this fair? It's
> completely avoidable! The terrifying part is that every insurance
> company I have ever had, has done similar things in the past. How is
> this freedom? Sure, I could file a hundred grievances with Empire
> BCBS, but they are so corrupt on one hand, and so incompetent on the
> other (one phone call to customer service and the irony is
> understood), that I fear it will be a futile effort. A simple appeal
> took 3 months. Empire BCBS uses 'Obamacare' as an excuse for
> incompetency, laziness and an utter lack of willingness to do their
> jobs. It took three weeks, phone calls every day (Mon-Fri) in which
> I was either on hold for 3-5 hours (at work!) or transferred to an
> office in Uruguay, only to find out that a crucial fax for my
> insulin pump (sent to a U.S. office) was actually received and
> denied! Three weeks! My primary care physician's office faxed it at
> least 8 times! I saw the faxes! Even the representative for the
> insulin pump company (Animas) couldn't get an answer from the
> insurance company! Every drug rep I have spoken to has been
> flabbergasted at what I've been through, stating they have not seen
> such appalling behavior from insurance companies before in their

> entire careers. One rep from Animas, the insulin pump company I am
> trying to switch to, actually had tears in her eyes out of empathy
> for my story. Things are getting worse, not better! I have a brand
> new insulin pump sitting in a box in my living room that I cannot
> use but have to pay \$700 for (due to my ?medical supply?
> deductible). My last pay cycle, I had \$10 left for a week before I
> got paid again. How the insurance company can ?cover? the pump but
> refuse my endocrinologist or the actual implementation of the pump
> due to who knows what- is absolutely astounding. Additionally, I am
> being forced to do mail order with all my prescriptions, including
> insulin, and have to trust them to get it to me on time and in the
> correct dosages- when they couldn?t even look for a faxed referral
> for three weeks and lied about it. These are the soulless, brainless
> people I have to trust with my life saving medications?! This is
> absolutely unacceptable. Last night, May 12th, I learned that Empire
> BCBS has NO system of prioritizing claims and no way to tell where I
> am in the queue. In other words, my insulin pump claim can wait in
> line behind someone's fungal cream rx for 6 months, and there is
> nothing BCBS can or will do about it, even if it means I could end
> up in the hospital and die. This from the mouth of a customer
> service rep and her supervisor. It's been 6 weeks waiting on this
> claim, alone, to process. It has been 3 months since this fight
> started. It could be another 6 months before my claim is approved or
> denied. I can?t take the risk and use my new insulin pump, because
> they might deny the claim, and I would have to pay over \$4,000 for
> it out of pocket. Unfortunately, I'm 12 days late on my premium
> payment (which I was waiting for my next paycheck this week to do)
> and I already got a notice in the mail for it. They are extremely
> quick to demand payment, when I?ve never missed a payment before,
> despite not providing any services to me. The insurance companies
> are out of control. My life is in their hands, and there is nothing
> I can do about it. My father has been a primary care physician for
> over 25 years. Without him providing me with samples of medications
> and doing everything in his power to keep me safe, I?d have been
> long since in a coma, or worse, dead. What about all the other
> people out there who are suffering the same circumstances and don?t
> have a doctor in their family to help them? That?s a lot of people
> who will get dangerously ill. My stories of the nightmare in which I
> live every day because of these insurance companies will never end
> until someone puts honest watchdogs on them. They are committing
> crimes against the citizens of this country. CEO?s of insurance
> companies make billions of dollars every year, and yet here I am,
> with \$10.00 until my next paycheck, struggling not to fall into a
> diabetic coma! When the CEOs of these insurance companies make more
> money than I will ever comprehend, yet deny basic medications to
> people who are scraping by paycheck to paycheck to pay their
> premiums... it?s deplorable! As it stands, Americans across the
> country have stopped paying their premiums in protest. I can?t
> participate, because I cannot afford to lose even the most remote
> semblance of health insurance. Something needs to give before people
> like me (without a father who?s a doctor) start dying in droves. I
> had my first endocrinologist appointment (June 2nd) since I was
> forced off my insulin pump. In less than 3 months, my Hemoglobin A1C
> went up to 8.8. That is a terrible number! With the insulin pump, my
> A1C has been as low as 6. Normal range (non-diabetics) is 5. Today,
> June 3rd, I was told my insulin pump was approved, but I have to pay
> an additional \$1,000 for it. I already am paying a \$700 medical
> supply deductible. They are claiming I have to pay 10%. The pump is
> \$4,000 and change. 10% of 4,000 is not \$1,700. So what exactly am I
> paying? I am on the poor working person?s plan, with a tax

> deductible, and yet I am paying more money for my health care than I
> was before Obamacare. I am paying money I do not have. These medical
> bills will bankrupt me yet! I had \$9.35 left before I got paid on
> May 30th. How are people like me supposed to survive? I cannot
> afford to pay proposed increase to (approx) \$285 every month! I AM
> BEGGING AND PLEADING WITH YOU, AS A HUMAN BEING- NOT A DAMN NUMBER!
> To even propose an increase is horrifically deplorable. This is
> EXTORTION! "You want to live? You want your insulin? Give us all
> your money and starve to death!" That is what the increase means for
> me. I work full time, and I cannot do this! I have no other means of
> making any more money!! I am typical of my demographic and this
> economy! Stop punishing me for being a poor type 1 diabetic! I will
> seriously pursue pressing criminal charges against Empire BCBS if
> this passes. I will get every ACLU type organization behind me, and
> I will pres

----- Forwarded by [REDACTED] on 07/08/2014 12:01 PM -----

[REDACTED] > wrote on 06/24/2014 10:59:25 AM:

> From: [REDACTED]
> To: <premiumrateincreases@dfs.ny.gov>,
> Date: 06/24/2014 12:36 PM
> Subject: Comments on request for rate increase

>
> Insurer: Empire HealthChoice HMO, Inc.
> Plan: Empire Platinum GuidedAccess ceaf
> Plan type: Ind ge
> Plan HIOS ID: [REDACTED]

>
> I subscribed through the NY Affordable Healthcare Act program to
> this plan only a few months ago. The first two months of service
> were disorganized and sub-par, though now I am generally satisfied
> with coverage.

>
> However, I just received notice that the insurer is requesting an
> 18.4% increase in premiums for 2015! The notice included no
> information justifying the increase nor documenting how it was calculated.

>
> This is supposed to be an AFFORDABLE health care act plan and an 18.
> 4% rate increase, after only one year, is excessive if not
> predatory. The absence of documentation to support the increase
> request also makes it clearly unjustified. This appears to be an
> example of a "bait and switch" approach
> to soliciting business. In what other industry, regulated or
> otherwise, would such a large increase be permitted? This increase
> should not be sanctioned. Particularly after the initial months of
> substandard implementation and with no documentation provided to
> justify this excessive premium hike.

>
>
>
> Thank you.

[REDACTED]
----- Forwarded by [REDACTED] on 07/08/2014 12:01 PM -----

NYS Department of Financial Services <portal@dfs.ny.gov> wrote on 06/24/2014
12:38:23 PM:

> From: NYS Department of Financial Services <portal@dfs.ny.gov>
> To: PremiumRateIncreases@dfs.ny.gov,
> Date: 06/24/2014 12:38 PM
> Subject: Prior Approval Submission

> Empire HealthChoice HMO, Inc.

> individual

> hmo

> [REDACTED]

> I'm struggling to pay my premium now. If this rate increase is
> approved, I will drop this health care provider and look else where
> for coverage

----- Forwarded by [REDACTED] on 07/08/2014 12:01 PM -----

NYS Department of Financial Services <portal@dfs.ny.gov> wrote on 06/24/2014
02:18:06 PM:

> From: NYS Department of Financial Services <portal@dfs.ny.gov>
> To: PremiumRateIncreases@dfs.ny.gov,
> Date: 06/24/2014 02:18 PM
> Subject: Prior Approval Submission

> Empire HealthChoice HMO, Inc.

> individual

> hmo

> [REDACTED]

> I got a notice on 6/18 that Empire HealthChoice HMO, Inc. wants to
> increase my monthly premium by 18.4%. I am outraged. Neither our
> primary physician, nor my wife's gynecologist accept this plan - who
> accepts it? Their Rx plan is a mess - I had to pay full price for my
> prescriptions at my pharmacy due to them not explaining that I HAD
> to enroll in mail delivery. They created this plan just for
> Obamacare and the plan sucks (not widely accepted) and is expensive
> - now they hate it.

----- Forwarded by [REDACTED] on 07/08/2014 12:01 PM -----

[REDACTED] wrote on 06/24/2014 01:53:14 PM:

> From: [REDACTED]
> To: <PremiumRateIncreases@dfs.ny.gov>,
> Date: 06/24/2014 03:37 PM
> Subject: Comments

> Empire HealthChoice HMO, Inc.

> Empire Platinum GuidedAccess ceaf
> erage
> [REDACTED]
>
> Under no circumstances should a 2015 rate increase be granted.
> Whatever service insurers think they are providing, they get a failing
grade.
> They continue to line their pockets at the cost of offering real service or
> accountability to subscribers. Consumers do not deserve to be asked to
> pay more for the poorest possible coverage.
>
> For example: in the zip codes 10021/10075 only two hospitals are
> in network, NY Presby + Lenox Hill. I searched for a female gynecologist.
> The online list of docs is padded with few names listed over and over.
> I made 20 phone calls and could not find one doc affiliated with either
> hospital who takes my coverage. The doc network BCBS is representing docs
> not exist. Docs have rightfully refused to sign on because the plans
> are garbage.
> They are not even minimally credible.
>
> I am outraged to think New York State can abide by the outrageous premium
rate
> change requested. All kinds of excuses are made why the premiums
> need to go up.
> Instead, NYS should be undertaking a serious investigation of legitimate
> complaints against the plans and demanding corrective action.
>
>
> [REDACTED]
>

----- Forwarded by [REDACTED] on 07/08/2014 12:01 PM -----

[REDACTED] > wrote on 06/24/2014 02:43:19 PM:

> From: [REDACTED]
> To: <premiumrateincreases@dfs.ny.gov>,
> Date: 06/24/2014 03:47 PM
> Subject: rate comments
>
> Insurer: Empire HealthChoice HMO
> Plan: 254 ("Tin")
> Individual coverage
> HIOS id number: [REDACTED]
>
>
> Empire lists several questionable reasons to justify their requested
> rate increase. One is "our new provider networks", as far as I can
> tell, they don't have any new networks. I've been a member of
> Empire plans for years, and the only thing different about the ACA
> network might be that it's a subset of their existing network - and
> has fewer doctors participating. That it took me two months to get
> an appointment with my selected primary care physician shows that
> this "new network" can't be very large.
>
> Another justification - "more benefits are available to more people"
> is not a justification to increase rates, since the "more people"
> are compensating Empire for those benefits.
>
> They also state the rising cost of medical care is a reason they

> need higher rates - I find that hard to believe; I'm in a plan where
> there's an enormous deductible. Participants are more likely to
> select a low-cost medical care provider as a result. I would like
> Empire to show that they are losing money on my current plan before
> asking for higher rates.

>
> I can't judge their final justification - that there are cost-
> sharing changes in 2015, but would guess that if they are in fact
> increasing the benefits and lowering the cost-sharing then that
> could make my "tin" plan more like a bronze plan. This limits the
> choice of available insurance in the NY marketplace - some of us
> really want insurance just to cover major issues and not subsidize
> every doctor's visit. The worst outcome would be if Empire turns my
> plan into a pseudo-bronze plan, which I (and many others)
> deliberately didn't choose initially.

----- Forwarded by [REDACTED] on 07/08/2014 12:01 PM -----

[REDACTED] wrote on 06/24/2014 11:24:17 AM:

> From: [REDACTED]
> To: "PremiumRateIncreases@dfs.ny.gov" <PremiumRateIncreases@dfs.ny.gov>,
> Date: 06/24/2014 03:54 PM
> Subject: Proposed Premium Rate Increases

> Hello,

> I just received a letter from my medical insurance company, Empire
> HealthChoice HMO, stating that they have applied for an 18.3%
> premium rate increase for 2015.

> This is insane robbery!! And what have they done to earn that kind
> of increase? After the HORRIBLE service they provided from September
> 2013 through April 2014, Empire HealthChoice HMO should be applying
> for a decrease. We spent so many hours on hold during that timeframe
> (listening to hours of that awful on-hold-music), that waiting to
> speak with them became a full time job. Their representatives
> constantly mixed up information and caused so much confusion with
> providers that it took months to sort things out. They made our
> lives miserable. And now they want to increase their rates? WHY?

> In their own words, they have a "new pool of customers." Doesn't
> that mean that business is better than ever and that money is
> pouring in? What do they need more money for? They claim that "there
> will be coverage and benefit changes to most plans." Do these
> changes include things that we specifically need? Heck, half of the
> stuff we're currently covered for is completely useless to us -- but
> we pay for it because the price point is reasonable. Now they want
> to add more useless stuff and charge us 18.3% more?

> Medical insurance companies are as greedy as Wall Street tycoons.
> Please do not give in to their demands for more money. Please make
> them manage their resources appropriately and stop squeezing us
> little people for everything we've got!

> Insurer: Empire HealthChoice HMO, Inc.
> Benefit Plan: Pathway X Enhanced
> Coverage:
> HIOS ID # [REDACTED]

> Thank you.

>

>

----- Forwarded by [REDACTED] on 07/08/2014 12:01 PM -----

[REDACTED] > wrote on 06/24/2014 01:19:27 PM:

> From: [REDACTED]

> To: <PremiumRateIncreases@dfs.ny.gov>,

> Date: 06/24/2014 04:20 PM

> Subject: Empire HealthChoice HMO

>

> June 24, 2014

>

> Dear NYS Depart of Finance:

>

> I was just informed by Empire of their request for a increase on my
> premium for 2015. I am writing to ask you to reject their request,

>

> I signed up with Empire through the NYS Health Exchange in January
> and have had the absolute worse experience ever. Their incompetence
> is beyond understanding, They did not get my billing right until
> March. Then, without telling me they cancelled my policy in April,
> then realized they made a mistake and reinstated me last week, in
> June. I did nothing wrong, I payed all my bills on time and they
> would keep taking away my subsidy for no reason, saying it was NYS
> fault. I never had any reason to see a doctor and never had a claim.
> But after six months of hell, going back and forth with these
> idiots, they want a 18% raise for what? I thought the whole idea
> of the affordable care act was to lower costs and not just to give
> insurance companies new clients so they can raise the fees once you
> signed up. One of the reason they say the need a raise is because
> they have a new pool of customers and new provider networks.
> Ultimately, that means more money and profit for them. Should we
> give them a raise for terrible service? Are these the type business
> partners and practices the NYS of Health wants to support?

>

> Please stop the madness of allowing them to raise their fees every
> year, year after year. I left Oxford last year because they kept
> raising my rates every year. Here is an example of someone who has
> not been sick, not even seen a Doctor this a year, had horrific
> customer care and they feel justified in charging more. I do not
> now how much profit Empire makes, but I am sure they are not
> hurting. Please stop this injustice.

>

> Sincerely,

>

[REDACTED]

>

> Empire Healthchoice HMO, Inc

> Empire Platinum Guided Access ceaf

> erage

>

>

>

>

>

----- Forwarded by [REDACTED] on 07/08/2014 12:01 PM -----

NYS Department of Financial Services <portal@dfs.ny.gov> wrote on 06/24/2014 05:26:48 PM:

> From: NYS Department of Financial Services <portal@dfs.ny.gov>
> To: PremiumRateIncreases@dfs.ny.gov,
> Date: 06/24/2014 05:26 PM
> Subject: Prior Approval Submission
>
> Empire HealthChoice HMO, Inc.
>
> individual
>
> hmo
>

[REDACTED]

>
> The company is propping an 18.4% increase over the 2014 plan.
> Although it is only \$88/a month over my 2014 premium, other factors
> such as rent increases and no wage increase from my temporary
> assignment any extra money at the end of the month.

----- Forwarded by [REDACTED] on 07/08/2014 12:01 PM -----

[REDACTED] wrote on 06/24/2014 05:41:14 PM:

> From: [REDACTED] >
> To: <PremiumRateIncreases@dfs.ny.gov>,
> Date: 06/24/2014 05:41 PM
> Subject: Premium Increase
>

> Dear Sir,

>
> HIOS ID # [REDACTED]
> EmpireHealthChoice HMO
> Individual Coverage
> Empire Silver GuidedAccess cdid [REDACTED]
>

> I am in receipt of a letter from my Insurance carrier, Empire Blue
> Cross Blue Shield, notifying me of a proposed premium rate change.
> The proposed increase is for 18.3%. This rate increase is
> absolutely despicable. With all the hours spent trying to enroll,
> changes, lies, finding new doctors, and dealing with deductibles we are no
> slapped with the possibility of an 18% rate increase. Who can
> afford an 18% increase? Understandable that it is a new program and
> kinks need to be worked out but why must we suffer more?
> The rush to roll out this program before it was ready has now become
> the burden of the people who can least afford this to happen.
> Something must be done to stop this from happening.

> Thanks,

> [REDACTED]

>
>
>

----- Forwarded by [REDACTED] on 07/08/2014 12:01 PM -----

[REDACTED] > wrote on 06/24/2014 07:45:19 PM:

> From: [REDACTED] >
> To: "PremiumRateIncreases@dfs.ny.gov" <premiumrateincreases@dfs.ny.gov>,
> Date: 06/24/2014 07:45 PM
> Subject: Complaint about Premium Rate Adjustment
>
> My identification number is [REDACTED]
> The name of my Insurer is Empire Healthchoice HMO Inc.
> My Empire benefit plan Platinum ceaf
> My coverage amount is \$620.00 monthly.
>
> To Whom it May Concern,
>
> I am very distraught after just changing my plan in 2014 because of
> the new Healthcare Reform Act that within one year of this change I
> am being notified by my insurer there will be an 18% increase,
> although my carrier is claiming that they are submitting a request
> for a rate increase to the DFS, at the bottom of the notification
> they positively stated that when the increase is approved I will be
> immediately notified. This type of verbiage suggests to me that this
> is a "done deal" and they are not really waiting for an approval
> from the DFS.
>
> Please help me as consumer who is already paying more than I
> expected to pay in this terrible economy to now hear that there will
> be another 18% increase within just one year. This is getting
> overbearing and in my opinion out of control "Please Help" block
> this rate increase. Thank you.
>
> Sincerely,
>
> [REDACTED]

----- Forwarded by [REDACTED] on 07/08/2014 12:01 PM -----

[REDACTED] wrote on 06/24/2014 07:53:30 PM:

> From: [REDACTED] >
> To: <premiumrateincreases@dfs.ny.gov>,
> Date: 06/24/2014 07:54 PM
> Subject: Comments on rate change
>
> Name of Insurer: Empire HealthChoice HMO, Inc.
> Benefit plan: Empire Catastrophic GuidedAccess
> Individual coverage
> HIOS identification number: [REDACTED]
>
> To Whom It May Concern:
>
> I am writing regarding a letter I received from my healthcare
> company, Empire Healthchoice HMO, Inc. This letter states that they
> are applying for a rate increase of 17.1% for my plan, whose details
> are listed above. I am writing to ask you to deny this increase application.
>
> I am a freelance worker who works in the tech start-up sector and
> also an amateur screenwriter. I had a great experience buying this
> plan through the NY State exchange, and did not have full insurance
> before (just a hospital insurance plan with Empire).

>
> I do not qualify for any tax credits, but I have a variable and at
> this point, relative modest, income of around \$25,000, before taxes.
> My healthcare bill increasing by 17% would require me to tighten an
> already tight belt.

> Please feel free to contact me with any requests or questions.

> [REDACTED]
----- Forwarded by [REDACTED] on 07/08/2014 12:01 PM -----

[REDACTED] > wrote on 06/24/2014 10:31:14 PM:

> From: [REDACTED]
> To: <premiumrateincreases@dfs.ny.gov>,
> Date: 06/24/2014 10:31 PM
> Subject: opposition to the increase

> To Whom It May Concern:

> My name is [REDACTED] and here is my health insurance information:

> Empire HealthChoiceHMO, Inc.
> Name of my plan: Empire Bronze Guided Access
> I have [REDACTED] verage.
> HIOS: [REDACTED]

> I received notice about an increase to my premium rate coverage and
> I am outraged. I am a small business owner and while I earn just
> enough income that I am not eligible for an Advanced Premium Tax
> Credit, the coverage I currently have is already a financial stretch
> for me. It is more than double the amount I was paying prior to the
> so-called "Affordable" Care Act.

> I am a very healthy individual who barely uses health insurance. I
> have this insurance for emergency purposes. I believe in healthcare
> for all but I cannot afford to subsidize others' healthcare this much.
> If you approve this increase by any percentage, and especially the
> 17% proposed by Empire, I will pursue other options for my healthcare.

> Thank you for your consideration.

> [REDACTED]
----- Forwarded by [REDACTED] on 07/08/2014 12:01 PM -----

NYS Department of Financial Services <portal@dfs.ny.gov> wrote on 06/25/2014
09:00:39 AM:

> From: NYS Department of Financial Services <portal@dfs.ny.gov>
> To: PremiumRateIncreases@dfs.ny.gov,
> Date: 06/25/2014 09:00 AM
> Subject: Prior Approval Submission

> Empire HealthChoice HMO, Inc.

> individual

> hmo

>

[REDACTED]

>

> I think an 18.4 percent increase too much it's now becoming the not
> so affordable healthcare act I don't think [REDACTED] rease will make
> new young p [REDACTED] THANKYOU [REDACTED]

----- Forwarded by [REDACTED] on 07/08/2014 12:01 PM -----

NYS Department of Financial Services <portal@dfs.ny.gov> wrote on 06/25/2014
09:45:39 AM:

> From: NYS Department of Financial Services <portal@dfs.ny.gov>

> To: PremiumRateIncreases@dfs.ny.gov,

> Date: 06/25/2014 09:45 AM

> Subject: Prior Approval Submission

>

> Empire HealthChoice HMO, Inc.

>

> individual

>

> hmo

>

[REDACTED]

>

> I have received a letter from my insurance carrier stating their
> intent to seek an 18.4% increase in my insurance premium. To say I
> am shocked and outraged by the unmitigated gall of this company is
> an understatement of gargantuan proportions. This is new insurance
> under The Affordable Care Act. How does an 18.4% increase translate
> to affordable? This is an obvious attempt by the insurance company
> to ask for a huge increase in the hope that they will say...get
> half, also a huge and greedy increase. Increases for insurance
> should be tied to the rate of inflation, now 2.1%. For years I
> watched my rates increase at unbelievable levels under Healthy New
> York. In the end I was paying \$475.00 for a policy equal to what I
> have now for \$120.00 and that was insurance for LOW INCOME PEOPLE
> making under \$28,000 a year and living on Long Island. Finally there
> is insurance people can afford and the money grab is underway. Put a
> stop to this now, send a message to the insurance industry that
> stealing from the poor to line the pockets of the rich is
> unacceptable

----- Forwarded by [REDACTED] on 07/08/2014 12:01 PM -----

[REDACTED] > wrote on 06/25/2014 10:54:57 AM:

> From: [REDACTED]

> To: <PremiumRateIncreases@dfs.ny.gov>,

> Date: 06/25/2014 10:55 AM

> Subject: Proposed Rate Increase in Empire Health Insurance Policy Premiums

>

> Dear sir or madam:

>

> I just received notice from Empire BlueCross BlueShield that they
> have applied to the NYS Department of Financial Services to increase
> the cost of my monthly health insurance premium by 17%! The said
> that I could contact you with any comments.

>
> I am writing to say that I find the proposed premium increase
> unreasonable and burdensome. I only obtained the relevant insurance
> coverage at the beginning of this year, through NYS health plan
> marketplace. It is the first health insurance I have had in years,
> because I am a self-employed single parent and the cost of coverage
> for myself was too expensive. Because of the new health care law, I
> signed up for coverage in January, at the most affordable rate that
> I could find in the marketplace. The proposed rate increase is
> unreasonable both because of its amount (17% is huge... not a nominal
> change that tracks the rate of inflation or similar) and because it
> comes so soon after the commencement of coverage. (I've only had my
> policy about 6 months!)

>
> I feel like this is a "bait and switch". I was compelled to sign up
> at a given rate and then just a few months later I am told that the
> rate is about to go up 17%. I find this an abuse of the marketplace
> by Empire. They offered a certain product, to which I committed, and
> now just a few months in they are trying to make it something very
> different.

>
> I do not qualify for subsidized health care because I earn "too
> much". However, I do NOT earn enough to make the cost of insurance
> easy to absorb. I currently pay \$395.20 per month just for myself
> for a healthplan with the least amount of coverage possible (ie the
> most economical). A 17% increase would bump my monthly expense by
> \$67.14 to \$462.48. I am additionally paying approximately that much
> for my son' health coverage under a separate plan, so that my total
> health insurance expense each month would approach \$1,000. That is
> not an expense I can carry and would force me to cancel coverage for
> myself. How can the new health law require individuals to carry
> health insurance, when the cost of the insurance that is made
> available is not affordable? \$1,000 per month is approximately 1/10
> of my monthly gross income and approximates what I am paying on my
> home mortgage. That is a massive expense by any standard.

>
> Please refuse Empire's requested increase in my health insurance
> premium. It is unreasonable and unfair.

>
> My HIOS identification number is [REDACTED] I have individual
> coverage. The name of my Empire benefit plan is Empire Essential
> GuidedAccess with Child Dental cdce. The name of my insurer is Empire
> HealthChoice HMO, Inc.

>
>
>
>

----- Forwarded by [REDACTED] on 07/08/2014 12:01 PM -----

NYS Department of Financial Services <portal@dfs.ny.gov> wrote on 06/25/2014
11:33:43 AM:

> From: NYS Department of Financial Services <portal@dfs.ny.gov>
> To: PremiumRateIncreases@dfs.ny.gov,
> Date: 06/25/2014 11:33 AM

> Subject: Prior Approval Submission

>

> Empire HealthChoice HMO, Inc.

>

> individual

>

> hmo-pos

>

> [REDACTED]

> [REDACTED]

> [REDACTED]

> First of all, I am very pleased with the coverage that Empire Health
> is providing me to date. What I don't understand, despite the little
> bit of explanation being provided, is why the company is now
> requesting an 18.4% premium increase for FY2015, within one year
> after I bought into the plan. This seems quite high, especially
> given that the company now has lots more customers paying premiums,
> which should be more than sufficiently contributing to their patient
> benefit charges. This increase seems exorbitant and would certainly
> be a financial hardship for me and I assume many others, even with
> the tax credit. Personally, it feels a bit deceptive having
> recruited so many new customers into the company and now within a
> year to be hiking the premiums by almost 20% Please scrutinize this
> premium adjustment request to make certain that it's legitimate and
> not loaded with additional active costs. Thank you.

----- Forwarded by [REDACTED] on 07/08/2014 12:01 PM -----

[REDACTED] > wrote on 06/25/2014 11:33:47 AM:

> From: [REDACTED] >

> To: "PremiumRateIncreases@dfs.ny.gov

> <premiumrateincreases@dfs.ny.gov>, [REDACTED] >,

> Date: 06/25/2014 11:33 AM

> Subject: proposed rate change on my premium for BCBS

>

> NYS Department of Financial Services

> Health Bureau - Premium Rate Adjustments

> 1 State St, New York, NY 10004

>

> NAME OF INSURER - Empire HealthChoice HMO inc

> Empire benefit plan - CEAF platinum

> Individual

> HIOS ID # [REDACTED]

> June 25th 2014

> To Whom it may concern.

> I am writing to submit comments in response to a letter dated June 18th

> 2014 from Empire Blue Cross, stating that they have submitted a

> request with DFS to approve a rate increase to my premium of \$620.69

> by 18.4% in January 2015.

> To say that I am beyond outraged at this is an understatement. I

> chose Empire BCBS via the Affordable care act., NY State market

> place. From the moment my coverage started Jan 1st 2014..... I have had

> nothing but stress, incompetence, stalling, emotional and physical

> upset, disgusting customer service, appalling communications and

> overall, the most terrible experience I have ever had with any

> company in my entire life.

> I have very advanced Rheumatoid Arthritis. I had been on a specialty

> drug called Actemera for years... And chose this plan , a platinum
> plan, more expensive than all the rest, to ensure I would be able to
> keep getting my monthly IV infusion of this drug. Empire BCBS have
> denied me this drug twice , since January....not only causing me to
> end up bed ridden, crippled and unable to function or move...but
> have caused unspeakable stress on me, in their perpetual resistance
> and stalling of approving this drug...and paying the specialty
> pharmacy they allocate to ship this drug out.
> My doctors office, Caremark (specialty pharmacy) and Accredo
> (original specialty pharmacy) are all besides themselves with
> frustration, anger, upset, hours and hours spent trying to get
> through to anyone in this organization that can help, that can
> oversee, that can offer any assistance whatsoever. They are so
> incompetent that the new pcp doctor I had to choose from their own
> list of network doctors...they disapproved her, causing no end of
> issues and then realized their own stupid mistake.
> After not allowing me to have my drug the first time.....which ended up
> as I said, crippled in bed because I needed my infusion.....and then
> approving...then changing their minds again in May....changing
> specialty pharmacy....then approving it.....then refusing to pay the
> specialty pharmacy for the drug.....again, stalling , and after my own
> personal calls and letters to the Grievances and Appeals department
> who NEVER return my calls...or put me through to anyone that can
> help.....I believe this insurance company to be acting like criminals
> and crooks. I have received my infusions finally...but payment for
> them is still an ongoing dispute.....even after we received
> authorization confirmation letters and references.
> With that all in mind, and that it is ONLY 6 months since the
> beginning of this affordable care act, and NY state market place.....
> for them to ask for an 18.4% increase in my premium, which is
> already so high, at \$620 a month, which I pay on time monthly , its
> beyond appalling, unjust and down right disgusting
> These are my comments on this

>

>

>

>

>

----- Forwarded by [REDACTED] on 07/08/2014 12:01 PM -----

NYS Department of Financial Services <portal@dfs.ny.gov> wrote on 06/25/2014
03:45:24 PM:

> From: NYS Department of Financial Services <portal@dfs.ny.gov>

> To: PremiumRateIncreases@dfs.ny.gov,

> Date: 06/25/2014 03:45 PM

> Subject: Prior Approval Submission

>

> Empire HealthChoice HMO, Inc.

>

> individual

>

> hmo

>

>

>

>

>

>

>

>

> The suggested 17.9% increase seems exorbitant. This is already a
> very high premium per person, for a limited network of providers and
> extremely limited network of hospitals. Stated reasons for
> requesting 17.9% include "cost-sharing changes, such as deductible,
> copays, coinsurance..." etc. but I have never seen any Blue Cross
> Blue Shield affiliated company do anything but raise those cost-
> sharing amounts, and cannot imagine that raising those along with a
> nearly 20% [redacted] um is warranted for such a small network.

----- Forwarded by [redacted] on 07/08/2014 12:01 PM -----

[redacted] > wrote on 06/25/2014 05:38:16 PM:

> From: [redacted]
> To: <PremiumRateINcreases@dfs.ny.gov>,
> Date: 06/25/2014 05:38 PM
> Subject: Premium Rate Increase

> [redacted]
> Empire HealthChoice HMO INC
> Empire Gold Guided Access ccav
> Individual Coverage
> HIOS Identification number: [redacted]

> While not shocked, I am extremely disappointed to hear about the
> proposed monthly premium increase of 18.4%. This is an outrageous
> leap in rates after only a year of coverage. Like many, I was
> hopeful and excited to gain affordable health coverage for the first
> time, but apparently it was a short lived victory. Even with the tax
> credit, I am stretched to the limits financially, having selected
> the gold plan. Although young and healthy, I selected this higher
> tiered plan to try and protect against the "downside" and to be more
> proactive in regards to my health care needs. This rate increase
> will force me to change insurance companies or downgrade from a gold
> to silver plan and settle for reduced coverage. I am sure the silver
> plan will be going up in price as well, lucky for us all.

> I will be searching for additional way to voice my opinion against
> these rate hikes.

> [redacted]
> Long Island

----- Forwarded by [redacted] on 07/08/2014 12:00 PM -----

[redacted] wrote on 06/26/2014 10:02:05 AM:

> From: [redacted]
> To: <premiumrateincreases@dfs.ny.gov>,
> Date: 06/26/2014 10:02 AM
> Subject: Questions HIOS ID [redacted]

> It's been 3 business days and I've received no response. Please
> respond efficiently so I am able to adjust and make decisions that
> greatly affect my health, finances & well being.

[redacted]
> Begin forwarded message:

> From: [REDACTED]>
> Date: June 21, 2014 at 11:56:55 PM EDT
> To: "premiumrateincreases@dfs.ny.gov" <premiumrateincreases@dfs.ny.gov>
> Cc: [REDACTED]
> Subject: Questions HIOS ID [REDACTED]

> Questions HIOS ID [REDACTED]
>
> Insurer: Empire HealthChoice HMO, Inc
> Plan: Empire Silv [REDACTED] bnz
> Name of insured: [REDACTED]
> I have i [REDACTED] rage.
> HIOS ID [REDACTED]
>
> I received a letter indicating rate changes for 2015. I would like
> more information.
>
> What would the new premium be?
> Would I have the same APTC applied?
> When do these changes take affect? I've only had this coverage since May
> 2014.
> My current premium is \$438.85, with my APTC I pay \$115 a month. What
> would that 18.4% change look like?
> What specific information caused this change to my account?
>
> Please list all information available for me. I would like all details.
>
> Please let me know as soon as possible so I am able to know my
> options and plan in advance for changes. Contact me by email or
> phone with the info below. Thank you.
>

[REDACTED]
----- Forwarded by [REDACTED] on 07/08/2014 12:00 PM -----

[REDACTED] > wrote on 06/26/2014 10:07:23 AM:

> From: [REDACTED]>
> To: <PremiumRateIncreases@dfs.ny.gov>,
> Date: 06/26/2014 10:07 AM
> Subject: Protesting the Proposed Premium Rate Increase from Blue
> Cross Blue Shield Silver Empire Plan
>

[REDACTED]
>
> Dear Sir/Madam,
>
> As a customer of healthcare insurance, you sometimes feel powerless
> over the decisions an insurance provider, or the DFS, make in rating
> insurance premiums. In this day and age, U.S. healthcare should be
> a right for everyone, and not a struggle to try to find a plan where
> you feel like it is servicing you, rather than you servicing its
> need for profit-making. I chose the Empire HealthChoice HMO, Inc.,
> (Empire Silver Plan) for myself and my wife through the New York

> State Health Plan Market Place. I felt this plan suited our needs
> best with its affordable rate. Not even six months have past, and
> they are suddenly claiming there is a health insurance oversight on
> the premium and are requesting an 18.4% increase. How is this
> affordable? That's almost 1/5 more than the current premium price.
> I request that you have the insurance company work out their plan in
> a way where they are not putting the burden on the consumer. Please
> do not approve this request to raise this premium.

>
>
>

----- Forwarded by [REDACTED] on 07/08/2014 12:00 PM -----

[REDACTED] > wrote on 06/26/2014 11:03:25 AM:

> From: "[REDACTED]" >
> To: <PremiumRateIncreases@dfs.ny.gov>,
> Date: 06/26/2014 11:03 AM
> Subject: Proposed Rate Increase

>
> I am writing with regard to the notification received from my health
> insurer, Empire HealthChoice HMO, Inc., of its request to the DFS for
> an 18.4% rate increase. My family and I have individual coverage
> under Empire's Platinum Guided Access Plan and our HIOS
> identification number is [REDACTED]

>
> If the above notification and the increases sought were not so
> tragically real, they would be quite comical. Six months into a
> mandatory plan purchase with inferior service, benefits and networks
> than what we previously had for roughly the same price (with
> different insurer, now not selling policies in NY State after the
> Affordable Care Act (ACA) went into effect), our gunshot marriage
> partner is asking for a near 20% increase with scant justification
> other than what can only be described as patent incompetence. In
> any other business, regulated or not, would this happen? 2 years to
> anticipate cost structures and impact after the ACA's initial
> passage and decades worth of experience with patterns and trends of
> medical cost movements and the intake of new annual subscribers are
> apparently not enough of a lead for the whiz kids over at Empire to
> be within 20% of a stable, agreeable, forward looking budget and
> forecast. What on earth could have changed so dramatically in 6
> months time that could to be foreseen?! Further, the stated reasons
> for the increase (increase in membership, rising medical costs,
> additional benefits (not required under the ACA) were all either
> well known in advance or are unwanted by the marketplace.

>
> As noted, if this were a normal business it would either be the
> subject of a comedic film or put out of business. If I were off 20%
> with this background and tactics I would either be fired, sued or
> potentially criminally prosecuted for fraudulently abusing the
> public trust. In a word, Chotzpah (look it up, if needed)...

>
> I imagine the DFS will approve the increase without conducting the
> proper public inquest as to why and how a quasi public service
> organization could be so far off to now go back on their word to the
> public only 6 months in and plead what can only be described as
> stupidity or incompetence. Unfortunately, that is the system we
> have and what government has become: an adversary, not a proper
> extension of, the people. It's too expedient to rubber stamp this
> and not put the incompetents to task (which is unfortunate because

> the last time I checked my kids' civic classes they are still
> operating under the apparent misbelief that government somehow
> represents the people)
>
> You have the ability to send a message and do your jobs. Say no to
> these folks and let the blood letting cease. At a minimum, do not
> reward them for being so incompetent as to how this could occur 6
> months in after over 2 years and decades to prepare with,
> presumably, Empire knowing their own business. Maybe at that point
> we can start instilling some more public belief and good faith in
government.
>
> Administering the ACA should be viewed s a sacred privilege by these
> corporations. That they don't speaks volumes as to how they conduct
> business and,, frankly, the lack of seriousness with which they
> regard their regulators, purportedly acting in the public's own
> good. However, as I mentioned, I anticipate business as usual with
> the taxpayers of NY and the country once again paying the bill for
> sheer neglect and incompetence.
>
> Please excuse the harsh tone of tis note. It is the unfortunate
> natural consequence of a populace fed up with being abused
>
> Sincerely,
> [REDACTED]
>
>
>

----- Forwarded by [REDACTED] on 07/08/2014 12:00 PM -----

[REDACTED] > wrote on 06/26/2014 11:23:50 AM:

> From: [REDACTED] >
> To: <PremiumRateIncreases@dfs.ny.gov>,
> Date: 06/26/2014 11:24 AM
> Subject: Health Insurance Rate Request Filing - Submitting my Public
Comments
>
> My insurer: Empire Health Choice HMO, INC.
> Empire Gold guided access
> Individu
> HIOS #: [REDACTED]

> The proposed rate increase is unfair and poorly justified. It
> contradicts the entire sales pitch behind the newly implanted "Obama
> Care". Raising rates within the first year of this new universal
> health plan is shadey and extremely disappointing.

> I live in brooklyn where my base monthly survival expenses are 2200/mo.
> I work 75 hours a week and make \$8.00- \$10.63 and hour!

> Do the math. Please stop squeezing the life out of lower class people.
> This increase should ONLY be applied to people whose rent is LESS
> than 1/3rd of their income.

> Thank you.

>
>
>
>

[REDACTED] [REDACTED]

----- Forwarded by [REDACTED] on 07/08/2014 12:00 PM -----

[REDACTED] wrote on 06/26/2014 01:45:22 PM:

> From: [REDACTED]
> To: <premiumrateincreases@dfs.ny.gov>,
> Date: 06/26/2014 01:45 PM
> Subject: Comments re Proposed Premium Rate Change
>
> Insured: [REDACTED]
> Address: [REDACTED]
> Insurer: Empire HealthChoice HMO, Inc.
> Plan: Empire Bronze GuidedAccess cabs.
> Individual coverage for [REDACTED] e, and my two children.
> HIOS #: [REDACTED]
>

> I'm writing to voice my concern about and disapproval for the
> proposed premium rate increase of 15.6% that is being proposed for
> 2015. The cost of these plans is already exorbitant by any measure,
> and the deductibles are also enormous, making the total health
> coverage experience almost completely unaffordable. Furthermore,
> given the existing costs of these plans, along with the high
> deductibles, someone like me is motivated to NOT go to the doctor
> because of the high out of pocket expense. Ultimately, this will
> lead to patients becoming sicker for longer periods of time, and in
> turn, requiring even more medical care down the road if they don't
> naturally heal!

>
> Instead of premium increases, the company should continue to look
> for cost cutting opportunities within their own ranks. Also, I'd
> suggest developing a health care option that rewards people who are
> in good shape! The gym reimbursement is a step in the right
> direction, but it should be expanded upon significantly. For
> example, if people fall within a weight class that is consistent
> with a certain height, they ought to pay less than someone who is
> considerably obese, unless it can be proved that there is some
> hormonal causal effect. Generally, the causal effect is
> irresponsibility, and as such, those folks ought to pay more!

>
> On this issue, I speak from experience. When I was much younger, I
> was extremely overweight, weighing in at 220 lbs, at a height of
> 5'10" at the age of 18. At that time, I undertook a major
> 'overhaul' and determined that I'd be facing a lifetime battle with
> an insatiable appetite, so I've had to use self-control, a rigorous
> exercise program, and education on healthy eating to keep myself at
> 170-175lbs for the past 35 yrs since then! I ought to be rewarded
> with lower premiums for this effort, in contrast to someone who is
> personally irresponsible with their own health.

>
> I am adamantly against any premium increase and I believe that the
> request by the insurer should be denied.

>
> Thank you for the opportunity to weigh in (pun intended!).

>
> Best,
> Ed

>
> [REDACTED]
> Founder & Chief Investment Officer

>

[REDACTED]

>

> Office: [REDACTED]
> Mobile: [REDACTED]
> Email: [REDACTED]
> Website: [REDACTED]
> Please note: For latest market views,

Blog, Soos Global Market Musings [REDACTED]

[REDACTED]

>

> Archived publications available on
> Morningstar [REDACTED] and SeekingAlpha [REDACTED].

>

> Also, visit StockCharts [REDACTED] and 'follow' us to
> stay current on our latest charts on "Stocks/ETFs of Possible Interest"!

>

> Twitter: "Follow" us [REDACTED]

>

>

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> fees continues to remain available for your review upon request.

>

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> applicability of any specific issue discussed above to his/her
> individual situation, he/she is encouraged to consult with the
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> written disclosure statement discussing our advisory services and
> fees is available for review upon request.

>
----- Forwarded by [REDACTED] on 07/08/2014 12:00 PM -----

[REDACTED] > wrote on 06/26/2014 02:30:41 PM:

> From: [REDACTED] >

> To: <premiumrateincreases@dfs.ny.gov>,

> Date: 06/26/2014 02:30 PM

> Subject: Empire Blue Cross

>

> I received a rate increase letter from Empire Blue Cross, explaining
> to me that because they are insuring a "large amount" of people they
> need a rate increase.

>

> I am an individual, my specific plan is INDIVIDUAL PLAN

>

> I have asked for the HIOS identification number of my plan - but
> have not received it as of yet.

>

> My comments begin with - Scott Serota, CEO of Blue Cross and Blue
> Shield Association, earned a bonus of \$1.6 million on a base salary
> of \$856,055, and BCBSA chief lobbyist Alissa Fox received a \$130,000
> bonus plus base pay of \$278,760

>

> My coverage was supposed to begin 1/1/14 but I didn't get an ID card
> until 3/19. I sure was billed from the 1/1.

>

> I still don't receive regular invoices - but if I miss a payment I
> sure do get a cancellation letter.

>

> I believe Mr. Serota should surrender his bonus to make up their
> shortfall and I should get a refund on 3 months of premiums for a
> service I couldn't use - but was mandated to have.

>

> Rate increase? I don't think so!

>

> Please, Please take the insurers out of the equation! We will be in
> the same boat we were in before ACA. Rate increases every year while
> insurers reap huge profits.

>

> Say "NO" to greed and "Yes" to the masses!

>

> Geo [REDACTED] a [REDACTED]

>

> [image remo

----- Forwarded by [REDACTED] on 07/08/2014 12:00 PM -----

[REDACTED] > wrote on 06/26/2014 02:31:54 PM:

> From: [REDACTED]

> To: <premiumrateincreases@dfs.ny.gov>,

> Date: 06/26/2014 02:32 PM

> Subject: Empire Blue Rate Increase

>
> I received a rate increase letter from Empire Blue Cross, explaining
> to me that because they are insuring a "large amount" of people they
> need a rate increase.
>
> I am an individual, my specific plan is INDIVIDUAL PLAN
>
> I have asked for the HIOS identification number of my plan - but
> have not received it as of yet.
>
> My comments begin with - Scott Serota, CEO of Blue Cross and Blue
> Shield Association, earned a bonus of \$1.6 million on a base salary
> of \$856,055, and BCBSA chief lobbyist Alissa Fox received a \$130,000
> bonus plus base pay of \$278,760
>
> My coverage was supposed to begin 1/1/14 but I didn't get an ID card
> until 3/19. I sure was billed from the 1/1.
>
> I still don't receive regular invoices - but if I miss a payment I
> sure do get a cancellation letter.
>
> I believe Mr. Serota should surrender his bonus to make up their
> shortfall and I should get a refund on 3 months of premiums for a
> service I couldn't use - but was mandated to have.
> Rate increase? I don't think so!
>
> Please, Please take the insurers out of the equation! We will be in
> the same boat we were in before ACA. Rate increases every year while
> insurers reap huge profits.
>
> Say "NO" to greed and "Yes" to the masses!
>
> [REDACTED]

> [image removed]
----- Forwarded by [REDACTED] on 07/08/2014 12:00 PM -----

[REDACTED] > wrote on 06/26/2014 03:30:38
PM:

> From: [REDACTED] >
> To: <premiumrateincreases@dfs.ny.gov>,
> Date: 06/26/2014 03:30 PM
> Subject: Empire rate increase
>
> Re: Empire HealthChoice HMO, Inc.
> Plan: Empire Essential Guided/Access w/Child Dental
> I have ind [REDACTED] ge
> HIOS ID # [REDACTED]-00
>

> Regarding the 10.8% rate increase in my premium, here we go again.
> This is like bait and switch, only this year, they did not even wait
> 12 months to ask for a double-digit increase. Based on what exact
> statistics? This is the largest provider in the country which has
> many new participants, so the rate should go DOWN--according to
> their own argument when the Affordable Care act was practically
> written by the insurance providers.
> I strongly urge you to deny this rate increase at least until a full
> 12 months of data can be examined by YOU. And, look at the salaries
> of their executives.

> Only real payments to physicians/hospitals, etc. should be
> considered, and they are supposed to be spending most our premiums on those.

> Once again, the insurance industry expects huge rate increases to be
> rubber stamped. Every year for the last 7 years this has happened to
> me with "your policy is cancelled, here is the new, more expensive
> one with fewer benefits."

> If we are to afford health insurance at all, it has to be actually
> affordable--not raised by 10% every year. Not to mention, the self-
> employed or "individual coverage" people like me use insurance far
> LESS than others, as statistics have proven over and over again.
> Finally, they could stop wasting time and money by ending the
> requirement you visit a physician just to get a "prescription" for a
> mammogram, which they themselves urge you to get. Why are TWO visits
> required for one preventive test? WASTE OF MONEY.

> Please deny this outrageous rate increase request.

>
>
>

----- Forwarded by [REDACTED] on 07/08/2014 12:00 PM -----

[REDACTED] > wrote on 06/26/2014 05:03:33 PM:

> From: [REDACTED] >
> To: <premiumrateincreases@dfs.ny.gov>,
> Date: 06/26/2014 05:03 PM
> Subject: Empire Blue Cross Blue Shield Premium Increases

> This is outrageous!

> Within less than 6 months of starting my new plan that was SUPPOSED
> to make my individual healthcare coverage less expensive.... Empire
> Blue Cross of NY is now asking for an 18% hike in my monthly premium!

> I am a sole proprietor of a small business with individual coverage.

> NOTE: My business has NOT rebounded to the levels it was before the
> 2008-09 economic debacle.

> If this 18% increase is passed, I will not be able to afford the
> additional \$70 per month added to my healthcare premium.

> With these rates, I guess I will be forced to opt out and to pay the
> fine and have NO HEALTHCARE COVERAGE and just hope I do not get sick.

> PATHETIC!

> YOU MUST KNOW THAT individuals are getting screwed with the
> Affordable Care Act. Insurers are dropping us like hot potatoes (ie:
> Oxford/United Healthcare).

> FIX IT!

> -DF

----- Forwarded by [REDACTED] on 07/08/2014 12:00 PM -----

[REDACTED] > wrote on 06/26/2014 07:17:30 PM:

> From: [REDACTED] >

> To: <premiumrateincreases@dfs.ny.gov>,
> Date: 06/26/2014 07:17 PM
> Subject: Empire Blue Cross Blue Shield rate increase of 18.5%
>
> I am submitting comments regarding the 18.5% increase to EBCBS.
> The DFS should reject these increases because I do not think they
> are substantiated.
> Based on my experience with EBCBS, there has not been evidence to
> warrant this increase.
> Examples of this include,
>
> -My doctor network has been severely reduced. Not one but TWO
> doctors believed they were covered in my plan and only after
> granting treatment, did they discover they were not and I had to
> dispute charges and pay more out of pocket.
>
> -My doctors billing staff have had a difficult time billing
> insurance companies for patient care. They have found communication
> from Empire, ineffective and confusing.
>
> -My new doctors are not as competent as previous doctors.
>
> -My grandmother, another Empire policyholder (for secondary
> insurance) received improper care by an urgent care center. The
> center incorrectly prescribed CIPRO -- which is toxic for seniors (she's
> 85).
>
> The DFS should acknowledge this increase will not improve care and
> as active voting citizen, I am submitting my opinion.
>
> --
> [REDACTED]
> [REDACTED]
> [REDACTED]
> [REDACTED]

----- Forwarded by [REDACTED] on 07/08/2014 12:00 PM -----

[REDACTED] > wrote on 06/26/2014 09:07:41 PM:

> From: [REDACTED]
> To: <PremiumRateIncreases@dfs.ny.gov>,
> Date: 06/26/2014 09:08 PM
> Subject: Urgent Inquiry
>
>
> Info: [REDACTED] oice HMO, Inc.
> Name: [REDACTED]
> Plan: Silver GuidedAccess cbnw
> Individual
> HIOS ID #: [REDACTED]
>

> Hello,

>
> I have several issues. I have tried contacting BCBS from the numbers
> on the back of my insurance card numerous times and through the
> website (which won't let me log in).

>
> I came home today to have two letters from BCBS:

>
> 1. Saying my coverage was cancelled on March 1
> 2. Saying my rate has increased.
>
> The first question is which is accurate? The bigger problem is
> complicated. I called in February to cancel this insurance because
> my job promoted me and gave me benefits. After multiple phone calls
> this was resolved and I was told it was successful cancelled.
> Therefore, I can't be late on payments because I was not supposed to
> be paying since I no longer needed coverage. The other issue here
> is: I was signed up for automatic payment withdrawal. So it would
> have been impossible for me not be paying if I did have coverage.
>
> This brings me to the new problem. I recently got a new job where
> they do not provide insurance. So I wanted to reapply to BCBS, but
> one of the letters says I can't and the other says I'd have to pay
> nearly \$500! How can I get my insurance reinstated now that I'm
> working at a non-profit that can't provide medical coverage? Do I
> have to pay back the last several months even though I was told this
> was cancelled.
>
> If you can provide any contact information for someone who can
> answer these questions (since I've had no success reaching Empire
> BCBS) I would appreciate it.

> Please help!

> Thanks,

> [REDACTED]

----- Forwarded by [REDACTED] on 07/08/2014 12:00 PM -----

[REDACTED] > wrote on 06/27/2014 12:37:46 AM:

> From: [REDACTED]
> To: "premiumrateincreases@dfs.ny.gov" <premiumrateincreases@dfs.ny.gov>,
> Date: 06/27/2014 12:37 AM
> Subject: Complaint about Premium Rate Adjustment

>
>
>
>
>
> My identification number is [REDACTED]
> The name of my Insurer is Empire Healthchoice HMO Inc.
> My Empire benefit plan Platinum ceaf
> My coverage amount is \$620.00 monthly.

> To Whom it May Concern,

>
> I am very distraught after just changing my plan in 2014 because of
> the new Healthcare Reform Act that within one year of this change I
> am being notified by my insurer there will be an 18% increase,
> although my carrier is claiming that they are submitting a request
> for a rate increase to the DFS, at the bottom of the notification
> they positively stated that when the increase is approved I will be
> immediately notified. This type of verbiage suggests to me that this
> is a "done deal" and they are not really waiting for an approval
> from the DFS.

>
> Please help me as consumer who is already paying more than I
> expected to pay in this terrible economy to now hear that there will
> be another 18% increase within just one year. This is getting
> overbearing and in my opinion out of control "Please Help" block
> this rate increase. Thank you.

>
> Sincerely,

>

> [REDACTED]

----- Forwarded by [REDACTED] on 07/08/2014 12:00 PM -----

[REDACTED] > wrote on 06/27/2014 09:31:18 AM:

> From: [REDACTED] >

> To: <PremiumRateIncreases@dfs.ny.gov>,

> Date: 06/27/2014 09:31 AM

> Subject: RE Proposed Rate Change by Empire BlueCross BlueShield

>

> I am writing to comment on the 18.4% premium rate increase proposed
> by Empire BlueCross BlueShield.

>

> One of the reasons Empire has given for the proposed increase is
> "the rising cost of medical care." Overall spending on healthcare
> in the U.S. rose less than 4% in 2012, continuing a 4-year slowdown
> in the growth of healthcare spending. I don't think the cost of
> medical care has risen enough to justify an 18.4% premium increase.

>

> Another reason Empire has given for the proposed increase is "our
> new provider networks." I question the legitimacy of this reason
> because the network available to me in 2014 as a member of Empire's
> Gold Guided Access plan, is more limited than the network that was
> available to me in the previous years I was insured by Empire. The
> smaller network is a particular sore spot for me since the main
> reason I chose an Empire plan through the State Exchange was that
> the list of in-network providers on the Empire Web site during the
> open enrollment period included the doctors I was accustomed to
> seeing and interested in keeping, and I was told by an Empire
> representative that my longtime primary care physician was in-
> network both as a specialist and as a primary care physician.
> After I enrolled, the story changed and I was told that several
> doctors I had counted on keeping, including my primary care
> physician, were no longer in network. I was told by an Empire
> representative that this was the doctors' decision. However, when I
> asked my doctors about this, they informed me that to their
> knowledge they had never been in-network for the new plans offered
> through the State Exchange. The loss of my primary care physician
> was a problem because I could not see a specialist without a
> referral; I was required to sign up with a new in-network primary
> care physician, who charged me nearly \$200 as a new patient, rather
> than seeing me for a preventive care visit, which was all I needed
> and would have been at no charge to me. This is an example of the
> waste built into the system, which could, and should, be eliminated
> by Empire and other insurers to help reduce the rising cost of medical care.

>

> Another reason given by Empire for the proposed premium rate
> increase is "Inclusion of, or changes to, Pediatric Dental benefits.
> This seems to be an ongoing source of confusion or perhaps
> misinformation. In 2013, prior to enrollment, I was told by an
> Empire representative that I must purchase a separate pediatric

> dental plan if my medical plan did not include it. I asked if this
> was the case even though I was a 61-year-old woman with no children
> and was told I would not be considered insured under the Affordable
> Care Act if I did not purchase a pediatric dental plan and would be
> subject to a penalty. I followed up with a supervisor at the State
> Exchange and was told I was not required to purchase pediatric
> dental care since there are no children in my household.

>
> Perhaps Empire has made, or at least considered, changes that it
> might make as a health plan other than passing its costs on to
> consumers. If so, I would be interested in hearing about them in
> addition to the information provided in the notice of proposed
> premium rate change.

>
> I urge the Department of Financial Services to approve only a more
> modest premium rate increase unless Empire can convincingly address
> the issues I have raised.

>
> Name of Insurer: Empire HealthChoice HMO, Inc.
> Name of Empire Benefit Plan: Empire Gold Guided Access
> Individual Coverage
> HIOS Identification Number: [REDACTED]

>
>
----- Forwarded by [REDACTED] on 07/08/2014 12:00 PM -----

[REDACTED] > wrote on 06/27/2014 10:01:03 AM:

> From: [REDACTED] >
> To: <premiumrateincreases@dfs.ny.gov>,
> Date: 06/27/2014 10:01 AM
> Subject: Comments- I Disapprove of the Rate Increase

>
> Empire Healthchoice HMO, Inc.
> Catastrophic Plan
> Individ
> HIOS # [REDACTED]

>
> To Whom it May Concern,

>
> It is with great disappointment that I am writing this email to the
> New York State Department of Financial Services. The fact that it is
> a struggle for me to make the payments on my health insurance each
> month due to an increase in the cost of living and a decrease in
> salary & raises, I am living paycheck to paycheck. Ultimately, I
> made the decision to enroll in health insurance to avoid the penalty
> costs, but it seems as though I'm being penalized irregardless. It
> has not even been a full 3 months since I've had the insurance and
> I'm already getting notices on a 17.1% rate increase. 17.1% is an
> exorbitant and ridiculous amount to increase the rate by. This and
> the fact that when tax season rolls around, I don't even know if
> I'll still be receiving a refund or owing money based on this
> whole health insurance enrollment. And I highly depend on that
> refund to help with bills etc. The fact that there are many people
> who still have not enrolled in insurance because they cannot afford
> it, just shows how much you guys DON'T CARE. I am part of a
> generation who went to college and graduated with 2 degrees and has
> been struggling to get a decent paying job ever since 2011. In an
> economy like this our generation tries to stay positive, however it
> is very difficult given the circumstances that we live in on a day-

> to-day basis. I must admit it feels good to finally say I have
> health insurance after several years, however being on the
> "catastrophic" plan is quite an embarrassment since its the only
> plan that I could barely afford and I'm not too keen on my assigned
> PCP. Let's not forget that the name of the plan is called
> "catastrophic," which is a terrible name to begin with. Ultimately,
> I learned to settle with this plan because all things have pros and cons.
>
> To justify the increase by saying cost of healthcare has increased,
> is just like everyone saying we need increases in salary because the
> cost of everything has increased. The only difference is we cannot
> get increases in salaries, it is not that simple. Though a law has
> been passed to increase the minimum wage it STILL has not been put
> into full effect. Therefore, the cost of living continues to
> increase while we remain on the same salary trying to make ends meet
> and living paycheck to paycheck for God knows how long. The fact
> that these plans were offered with the impression that most people
> would be able to afford them is ludicrous with this rate increase in
> play after a few months of enrollment. These circumstances and ways
> to solve them, should have been thought of from the very beginning.
> I know my comments may probably not get very far, however it is
> critical for me to make my voice heard. If increases must be made
> then 5% makes sense 17.1% is outrageous! Please kindly take my
> comments into consideration when putting forth this request for a
> 17.1% rate increase. Thank you for your time.

> Kind regards,

>

> [REDACTED]

>

> Sent from m

----- Forwarded by [REDACTED] on 07/08/2014 12:00 PM -----

NYS Department of Financial Services <portal@dfs.ny.gov> wrote on 06/27/2014
10:12:08 AM:

> From: NYS Department of Financial Services <portal@dfs.ny.gov>
> To: PremiumRateIncreases@dfs.ny.gov,
> Date: 06/27/2014 10:12 AM
> Subject: Prior Approval Submission

> Empire HealthChoice HMO, Inc.

> individual

> hmo-pos

>

> [REDACTED]

>

> [REDACTED]

>

> [REDACTED]

>

> Empire Blue Cross Blue shield wants to increase my premium by 18.4%
> I already pay \$ 620.69 per month and the increase will bring my
> payment to \$734.89. Please do not let that happens. Such an increase
> should be illegal. This represents such a big chunk of my salary. My
> salary like millions of others hasn't gone up in years. I already
> work about 60 hours a week. It is not surprising that so many people
> work much less hours and file for straight Medicaid.

----- Forwarded by [REDACTED] on 07/08/2014 12:00 PM -----

[REDACTED] > wrote on 06/27/2014 01:15:05 PM:

> From: [REDACTED] >

> To: <premiumrateincreases@dfs.ny.gov>,<

> Date: 06/27/2014 01:15 PM

> Subject: Rate increase (# [REDACTED])<

>

> Hello,<

>

> I am a freelance filmmaker living in Queens. There are many ways
> that I -- a single, sole-proprietor of an LLC -- get punished for my
> line of work such as high tax rates and self-paid insurance. My
> income is inconsistent and I chose Empire BC/BS because it was the
> most feasible within my budget and I would like it to stay at the
> rate I signed on to just a few months ago.<

>

> Mind you, I can't go to a physician to assess my overall health
> when I'm feeling off with this plan; this plan is just in case I get
> hit by bus, develop cancer or worse. Everything else is out of
> pocket, uninsured.<

>

> I, essentially, with this catastrophic plan that I can already
> barely afford, am living each day hoping a cold doesn't become
> something incapacitating for financial reasons. I debate whether a
> sprained wrist is actually broken and needs real care for financial
> reasons. I am not a human being who's life has value in this
> system; I am a policy number to shell money to people who have a
> stranglehold on this system that denies basic humanity to the
> destitute, underpaid, or the marginally employed. Instead of
> following my dreams and goals as a filmmaker, in this system, I'm
> better off with a job with benefits, doing the 9-to-5 and slowly
> becoming cowed and complacent.<

>

> This is not hyperbole. I've lived in Europe for over a year and
> have traveled around the world witnessing the unfathomable, simple
> happiness of people living without a care of harm for the sake of
> their bank accounts. Money is secondary in other places around the
> world. You work to live, not life to work.<

>

> I was in a terrible scooter accident in Sardinia two years back.
> I was picked up in an ambulance, spent a day in an Italian
> hospital, got cleaned up and CAT-scanned. For free. As a
> foreigner. The Italian medics never even asked for my ID. They saw
> I was injured and treated me. They were human. Money has no place
> in decency.<

>

> You have listed some inane reasons for this rate increase to my
> catastrophic plan but the real reason is simple: because you can. You can
> do this. You can do whatever you want. HMOs and other insurance
> companies have a stranglehold on a wholly unfair and inhumane system
> to make money off of peoples' well-being under the guise of "in case
> something happens".<

>

> I also like the idea that you asked people to comment on this rate
> increase as well. This is like saying a silent prayer in church.
> If this gets read by a single human being of consequence, I'd be shocked.<

>

> To be clear, I am not destitute. I'm doing okay, financially<

> speaking. Sure, money is tight, but I'm positive there are people
> raging about this proposed increase for reasons more dire than mine.
> I hope they are of bigger concern and have a louder voice than mine
> but, regardless, you do whatever you want. Because you can.

>

----- Forwarded by [REDACTED] on 07/08/2014 12:00 PM -----

<[REDACTED]> wrote on 06/27/2014 01:17:59 PM:

> From: [REDACTED]
> To: <PremiumRateIncreases@dfs.ny.gov>,
> Date: 06/27/2014 01:18 PM
> Subject: Empire BC/BS Proposed 2015 Premium Increase

>
> I am writing in strong opposition to Empire's outrageous proposed
> increase of 18.4% to my healthcare premium. Who gets that kind of
> SIZABLE increase in rates? In the first quarter of 2014 the
> national economy shrunk by 3% due largely to a DECLINE in healthcare costs.

>
> My plan is the Empire Silver GuidedAccess cbnz. The name of my
> insurer is Empire HealthChoice HMO, Inc.

> I have individual coverage which I purchased through the NYS of
> Health exchange during open enrollment.

> My coverage beg [REDACTED] My current premium is \$438.85. My
> HIOS number is [REDACTED]

>
> Since I live on a fixed income and won't be eligible of Medicare for
> 3 more years I have no choice but to get coverage through the
> exchange. These for-profit insurance companies primary objective is
> to deliver profits
> to their shareholders at the expense of those they supposedly cover.

>
> An 18.4% premium increase will negatively impact my quality of life.
> It is unwarranted and unfair.
> I ask that you do the right thing and decline it.

>
> Thank you.

>
> Best regards,

>

>

>

----- Forwarded by [REDACTED]

[REDACTED] wrote on 06/27/2014 05:46:36 PM:

> From: [REDACTED]
> To: <PremiumRateIncreases@dfs.ny.gov>,
> Date: 06/27/2014 05:46 PM
> Subject: notice of proposed premium rate coverage

>
> To Whom It May Concern:

>
> re: Empire HealthChoice HMO, Inc.
> Empire Gold Guided Access ccav
> individu
> HIOS id [REDACTED]
>
> In response to Empire's request for an 18.4% increase-
>
> I strongly oppose this increase. It is an unconscionable amount.
> The only plan I could afford under the new Affordable Care Act
> was a high-deductible plan. So essentially, I am paying for
> catastrophic coverage.
>
> Preventative care is supposed to be covered and yet I have received
> high bills for a visit to a primary care doctor for the sole purpose
> of obtaining a referral. It seems that Empire is offering providers
> even less than they
> did under the terminated Healthy NY program as my dermatologist is no longer
> included in their network.
>
> I pay \$354 monthly and the federal gov't pays \$170 monthly for this
> coverage.
> I don't have any chronic illnesses.
> I have to pay my dermatologist 100% out of pocket as I cannot use any
> of Empire's network specialists.
>
> So, basically, unless something changes, 100% of my premium is
> profit for Empire.
> While I understand that I am in a pool of members it seems to me that
> something is out of order with regard to this company's expectations
> for risk/reward.
>
> Again, I st [REDACTED] Empire's request for an 18.4% increase.
> Sincerely, [REDACTED]
----- Forwarded by [REDACTED] on 07/08/2014 12:00 PM -----

[REDACTED] > wrote on 06/27/2014 05:53:18 PM:

> From: [REDACTED] >
> To: <premiumrateincreases@dfs.ny.gov>,
> Date: 06/27/2014 05:53 PM
> Subject: 18.4% increase in health insurance premiums
>
> Empire Health Choice HMO, Inc
> Pathway Enchanced
> Contract Code OSV0
> Individual Coverage
> HIOS ID # [REDACTED]
>
> I have received a notification from my Health Insurance Provider,
> Empire Blue Cross Blue Shield of NY that they are proposing a 18.4%
> rise in premiums for 2015.
>
> What company proposes an 18.4% rate increase? That would equate to a
> \$78.63 rise in my monthly premiums. I feel that there can be no
> justification for a rate rise of this magnitude. I have never
> received a salary increase of 18.4% and will have no way to afford
> such an increase without forgoing other basic living needs. I
> strongly protest this rate rise and ask the DFS to disapprove of it.
>

[REDACTED]
[REDACTED]
----- Forwarded by [REDACTED] on 07/08/2014 12:00 PM -----

NYS Department of Financial Services <portal@dfs.ny.gov> wrote on 06/27/2014 08:22:00 PM:

> From: NYS Department of Financial Services <portal@dfs.ny.gov>
> To: PremiumRateIncreases@dfs.ny.gov,
> Date: 06/27/2014 08:22 PM
> Subject: Prior Approval Submission
>
> Empire HealthChoice HMO, Inc.

> individual
>
> hmo

> [REDACTED]

> [REDACTED]

> [REDACTED]

> I am writing to express my opposition to the large proposed
> increases to my insurance premium! I currently pay \$523.36 and
> Empire Blue Cross Blue Shield is proposing an 18.4% increase in
> rates! This is way too much! I have had many problems finding a
> provider on this plan and the over \$500 rate is already difficult to
> pay. Increasing the rate by almost 20% is way too high of an
> increase, especially on a plan I've only been on for a few months. I
> find it difficult to imagine that the plan costs have increased so
> significantly in a matter of 2 months that I have been on the plan!
> Please do not allow them to increase the plans this significantly!
> Thank you f [REDACTED] rt!

----- Forwarded by [REDACTED] on 07/08/2014 12:00 PM -----

[REDACTED] > wrote on 06/27/2014 11:49:35 PM:

> From: [REDACTED]
> To: <premiumrateincreases@dfs.ny.gov>,
> Date: 06/27/2014 11:49 PM
> Subject: citizen comment on rate increases

>
> Hello -- I am a customer of Empire HealthChoice HMO, Inc. I'm
> covered under the Empire Essential GuidedAccess w/HSA cdib.
> I have individual coverage.
> My HIOS identification number is [REDACTED]

>
> I am vehemently against this rate increase because there is no
> detailed explanation for it and I am completely dissatisfied with
> the type of service I'm getting currently. The doctors in this
> network are clearly more interested in short-term profits and seem
> to want to shoo me in and out of the office as quickly as possible.
> They don't talk about preventative health, they don't seem
> interested in my long-term wellness, and I've recently seen my pool
> of doctors shrink instead of growing.

>

> This is not a health care system. I don't feel that the dollars I'm
> spending are getting me a quality product. Paying 18.3% more in one
> year for a bad product does not make sense. Healthcare is the wrong
> product for the free market but if it must be so, there must be
> strict controls to protect citizens of all income levels.
>
> Please demand more explanation from Empire Blue Cross Blue Shield about
their:
> 1. Administrative expenses
> 2. Financial structure vis-a-vis primary care (how doctors are paid)
> 3. Willingness to comply with the Affordable Care Act
> 4. Overall transparency
> 5. Lobbying and public relations expenses
>
>

> [REDACTED]

> New York

----- Forwarded by [REDACTED] on 07/08/2014 12:00 PM -----

[REDACTED] wrote on 06/28/2014 01:16:28 PM:

> From: [REDACTED]
> To: <PremiumRateIncreases@dfs.ny.gov>, [REDACTED], >
> Date: 06/28/2014 01:16 PM
> Subject: notification of rate increase Blue Cross plan
>

> I am currently insured by Empire Blue Cross Blue Shield, Empire
> HealthChoiceHMO, Inc. I began coverage on January 1, 2014. The name
> of my plan is Empire Premier Guided Access Platinum c ve
> individual coverage un My ID number is [REDACTED]
> and my HIOS number is [REDACTED]
>

> I have received a letter from Blue Cross notifying me that the cost
> of my health plan will go up 17.9% on January 1, 2015. Since you are
> asking for comments, I would like to say that if that rate increase
> is approved, I am thinking of looking for another insurer for 2015.
>

> I have not been well satisfied with Blue Cross. They continually
> fail to approve medications that my GP deems necessary for my
> condition, and I have never been able to access their website,
> despite numerous tries and complaints.
>

> Sincerely,
>

> [REDACTED]

----- Forwarded by [REDACTED] on 07/08/2014 12:00 PM -----

[REDACTED] wrote on 06/28/2014 08:39:03 PM:

> From: [REDACTED]
> To: "premiumrateincreases@dfs.ny.gov" <premiumrateincreases@dfs.ny.gov>,
> Date: 06/28/2014 08:39 PM
> Subject: Empire HealthChoice HMO, Inc./Individual Coverage
>

> Plan ID# [REDACTED]
> HIOS ID# [REDACTED]
>

> I am writing to oppose Empire's request for a premium rate increase
> on my health insurance coverage. We purchased coverage through the
> exchange hoping to find an affordable rate. My husband is self

> employed and I am a stay at home mom, so we cannot avail ourselves
> of group coverage through our employer, nor is our income so low
> that we qualify for Medicaid or healthy kids etc. Although the rate
> through empire was slightly lower then what we were previously
> paying, I wouldn't say \$1,477 is affordable. We have a high
> deductible and 10% co-insurance as well, which means since we have
> been fortunate enough to be a fairly healthy family we have paid our
> premiums and have not had empire pay a claim this year to date. The
> proposed increase of 18.5% would raise our premium to \$2,150 which
> we cannot afford. The alternative would be to change insurance
> companies yet again or to remain without insurance. My family is
> made up of myself, my husband and three children ages 14, 5 and 1;
> without insurance one accident or serious illness could destroy our
> families financial stability. Please reject Empire's proposed
> premium increase. It is unconscionable and unreasonable and goes
> against the entire motivation behind healthcare reform.

> Sincerely

> [REDACTED]
> [REDACTED]

> ----- Forwarded by [REDACTED] on 07/08/2014 12:00 PM -----

NYS Department of Financial Services <portal@dfs.ny.gov> wrote on 06/28/2014 10:34:29 PM:

> From: NYS Department of Financial Services <portal@dfs.ny.gov>
> To: PremiumRateIncreases@dfs.ny.gov,
> Date: 06/28/2014 10:34 PM
> Subject: Prior Approval Submission

> Empire HealthChoice HMO, Inc.

> individual

> hmo

> [REDACTED]
> [REDACTED]

> [REDACTED]

> Please disapprove the premium rate increase that my insurer Empire
> HealthChoice HMO, Inc, is requesting from you for year 2015 and
> beyond. My benefit plan is Empire Silver GuidedAccess and I have
> [REDACTED] age. My HIOS identification number is
> [REDACTED] My new and current monthly premium following the
> Affordable Care Act is \$418. An 18.3% increase results in a
> significant hardship to a nearly \$500 monthly premium, close to what
> I was paying before discontinuing my old insurance. I emphasize my
> request that [REDACTED] e this rate increase.

> ----- Forwarded by [REDACTED] on 07/08/2014 12:00 PM -----

[REDACTED] wrote on 06/29/2014 01:51:55 AM:

> From: [REDACTED]
> To: "premiumrateincreases@dfs.ny.gov" <premiumrateincreases@dfs.ny.gov>,
> Date: 06/29/2014 01:52 AM

> Subject: Empire proposed rate increase
>
> Dear Sirs,
> I was just notified that Empire HealthChoice HMO has requested to
> increase my premium next year by 18.5%. The amount of this increase
> is astronomical. The economy continues to be in a recession, but
> despite this, Empire and other health insurers feel they can
> arbitrarily increase our insurance by a huge amount each year.
>
> It's becoming increasingly impossible to live in New York, with the
> sky-high housing, property taxes, state tax, and now health insurance
> is becoming a huge burden. My own personal health insurance is
> becoming nearly as high as the property tax on my entire house!
>
> If you continue to allow insurers to increase their premiums by
> nearly 20% each year, you will notice a significant increase in the
> rate of people and businesses continuing to relocate out of the
> state. This is not going to build the vibrant future for New York
> that I'm sure you're trying to create. It will do just the opposite
> and kill the economy.
>
> Insurer: Empire HealthChoice HMO
> Benefit Plan: Empire Preferred GuidedAccess ceceb
> Individual
> HIOS ID # [REDACTED]
----- Forwarded by [REDACTED] on 07/08/2014 12:00 PM -----

[REDACTED] > wrote on 06/29/2014 12:30:59 PM:

> From: [REDACTED] >
> To: <premiumrateincreases@dfs.ny.gov>,
> Date: 06/29/2014 12:31 PM
> Subject: Proposed Rate changes Too High
>
> I am writing to submit a complaint on increase of my plan for 2015
> to be 18.4%. I am currently unable to get financial assistance and
> yet the increase makes having individual insurance a huge hit to me
> financially, to the point of not being able to afford any of the
> market place plans. I feel an 18.4% increase is far too high for a
> single year and not typical of what the size increases of plans I
> have previously been on. The cost of insurance is much too high for
> an average consumer who can not get assistance.
>
> Please do not put another burden on finances with this increase,
> this increase along with the high deductible make having insurance
> impossible. Another citizen will go uninsured.
>
> My plan:
> Empire HealthChoice HMO, Inc
> Empire Brozne Guided Acces with HSA
> I have individual coverage
> My HIOS ID: [REDACTED]

> [REDACTED]
>

> [REDACTED]
> [REDACTED]

----- Forwarded by [REDACTED] on 07/08/2014 12:00 PM -----

NYS Department of Financial Services <portal@dfs.ny.gov> wrote on 06/29/2014 04:56:06 PM:

> From: NYS Department of Financial Services <portal@dfs.ny.gov>
> To: PremiumRateIncreases@dfs.ny.gov,
> Date: 06/29/2014 04:56 PM
> Subject: Prior Approval Submission
>
> Empire HealthChoice HMO, Inc.
>
> individual
>
> other
>

[REDACTED]
[REDACTED]
[REDACTED]

>
> I'm sure health care costs have gone up during the past year but 17.9% seems to be very extreme. Insurance companies have been able to control some of the costs by the volume of customers. I do believe that Empire has the biggest volume of customers. The new pool of customers may or may not increase costs for my plan. I changed plans previous to this year because my former plan, although excellent, had premiums that just got to be so high and they went up so much each year. I enrolled in this current plan because the premium was affordable; but with the approximate 17.9% increase that has been requested, and I'm sure will be asked for each year, I don't think [REDACTED] able for much longer.

----- Forwarded by [REDACTED] on 07/08/2014 12:00 PM -----

[REDACTED] wrote on 06/29/2014 05:44:43 PM:

> From: [REDACTED]
> To: <Premiumrateincreases@dfs.ny.gov>,
> Date: 06/29/2014 05:45 PM
> Subject: Bluecross blueshield rate increases
>
> Hello,

> I am an obamacare insured person who is married and living in NYC with my husband. Even with the subsidy, I pay 371 per month for EmpireHealthChoice HMO, Inc. It's the silver plan and my HIOS ID number is [REDACTED]

> I just got a letter in the mail telling me my premium is expected to rise 18% next year. We make around 40000 per year. I don't know how I'm expected to pay this much for insurance. This is already a very high amount. We live in a very expensive place because that is where we work. The deductible on this insurance is so high that I cannot afford to get cataract surgery even though I am going blind. I can't afford to do anything with this insurance, in fact, except get the free primary care checkups. I'm sure that the executives of bluecross blueshield are not hurting for money, yet they are passing off costs to the middle class people of New York state who are struggling to stay afloat. I just want to register my dissent. These

> insurances need to be cheaper or we need a single payer state-run
> option in New York State. Why are my friends in other states paying
> \$260 per month for healthcare that covers all of their needs? It
> should be illegal to raise prices on a service that we HAVE to
> purchase when the company is making record profits.

> THIS IS TOTALLY UNFAIR.

>

>

----- Forwarded by [REDACTED] on 07/08/2014 12:00 PM -----

[REDACTED] wrote on 06/29/2014 06:14:16 PM:

> From: [REDACTED] >
> To: "premiumrateincreases@dfs.ny.gov" <premiumrateincreases@dfs.ny.gov>,
> Date: 06/29/2014 06:14 PM
> Subject: Rate increases

>

> Hi,

>

> I oppose the rate increases as I paid over \$7,000/- so far and went
> to the doctor only once for a physical exam. I don't see how premium
> rise is justified. Also 15% rate rise is OUTRAGEOUS.

>

> My info

> Name of insurer: Empire HealthChoice HMO
> Name of benefit plan: Empire Blue Cross Blue Shield
> Coverage: [REDACTED] and Family
> HIOS#: [REDACTED]

>

> I strongly oppose any rate rise. In fact, premiums should decrease
> and coverage should expand.

>

> Thanks,

>

>

>

> Sent from m

----- Forwarded by [REDACTED] on 07/08/2014 12:00 PM -----

[REDACTED] wrote on 06/29/2014 08:00:12 PM:

> From: [REDACTED] >
> To: "premiumrateincreases@dfs.ny.gov" <premiumrateincreases@dfs.ny.gov>,
> Date: 06/29/2014 08:00 PM
> Subject: Proposed rate increase

>

> To whom it may concern,

>

> I have had my coverage for about 2 months and already I received a
> notice that my bill may be increasing. I was wary about signing up
> for coverage in the first place and feel like I was forced to do it
> in order to avoid being penalized. On top of this, the rate increase
> is 17.1%! That's roughly 10 times the rate of inflation! This seems
> ridiculous to me and I'm asking that you do not approve such an increase.

>

> My insurer is Empire HealthChoice HMO, inc.
> My benefit plan is Empire Catastrophic Guidedaccess.
> I have individual coverage.

> My HIOS ID number is [REDACTED]

>

> Thank you,

> Ben

>

> Sent from m

----- Forwarded by [REDACTED] on 07/08/2014 12:00 PM -----

NYS Department of Financial Services <portal@dfs.ny.gov> wrote on 06/30/2014 09:04:12 AM:

> From: NYS Department of Financial Services <portal@dfs.ny.gov>

> To: PremiumRateIncreases@dfs.ny.gov,

> Date: 06/30/2014 09:04 AM

> Subject: Prior Approval Submission

>

> Empire HealthChoice HMO, Inc.

>

> individual

>

> hmo

>

> [REDACTED]

> [REDACTED]

> [REDACTED]

>

>

>

> GuidedAccess cdid Individual Coverage HIOS #:

> [REDACTED] This coverage is too costly to begin with. Empire

> BCBS is a completely inefficient company. Their website didn't work

> for 3 months and now is barely useable. So many redundancies and

> waste of money in their customer service operations, I don't think

> it is fair that they pass on these costs to the customer. 18% is

> ridiculous! Reduce the waste at your own company and maybe a rate

> hike closer of inflation would be justified.

----- Forwarded by [REDACTED] on 07/08/2014 12:00 PM -----

NYS Department of Financial Services <portal@dfs.ny.gov> wrote on 06/30/2014 10:54:20 AM:

> From: NYS Department of Financial Services <portal@dfs.ny.gov>

> To: PremiumRateIncreases@dfs.ny.gov,

> Date: 06/30/2014 10:54 AM

> Subject: Prior Approval Submission

>

> Empire HealthChoice HMO, Inc.

>

> individual

>

> other

>

> [REDACTED]

> [REDACTED]

> [REDACTED]

>

>

>

> I'm not sure if I filled in the above questions correctly. I have

> Empire BlueCross BlueShield: Empire Silver Guided Access cbny HIOS.

> The letter states that they want to hike the premium by 18.4%. I
> think this is outrageous and an end game around the whole purpose of
> affordable health care. If they have a new pool of customers, their
> rates should go down. It took months to get set up with them. I
> wasn't impressed with how they did anything. Please don't sell out
> the people !

----- Forwarded by [REDACTED] on 07/08/2014 12:00 PM -----

NYS Department of Financial Services <portal@dfs.ny.gov> wrote on 06/30/2014
12:06:24 PM:

> From: NYS Department of Financial Services <portal@dfs.ny.gov>
> To: PremiumRateIncreases@dfs.ny.gov,
> Date: 06/30/2014 12:06 PM
> Subject: Prior Approval Submission
>
> Empire HealthChoice HMO, Inc.
>
> individual
>
> hmo
>

[REDACTED]
[REDACTED]
[REDACTED]

>
> To whom it may concern, I just received a letter from Empire BCBS
> informing me that they have requested a rate increase of 17.9
> percent. Are they crazy!!! In all my years dealing with health
> insurance companies never have I received a request for an increase
> that large. I am NOT on the healthcare exchange and I am paying 620
> per month now!!! I don't know how people are supposed to pay these
> outrageous premiums. There are very few options for people in NY
> state to choose from. Unfortunately not everyone was able to qualify
> for the healthcare exchange. I can not afford such a steep increase.
> And for the customer service they provide (which has been a
> nightmare I will gladly pay a 00.1 increase) Please help me and
> thousands o his outrageous increase. Thank you.

----- Forwarded by [REDACTED] on 07/08/2014 12:00 PM -----

[REDACTED] wrote on 06/30/2014 12:31:37
PM:

> From: [REDACTED]
> To: <premiumrateincreases@dfs.ny.gov>,
> Date: 06/30/2014 12:31 PM
> Subject: Premium Rate Increase
>
> To Whom It May Concern,
>
> I received a letter from Empire Health Choice HMO indicating my
> OBAMA healthcare plan will increase from \$207 to \$417.57 monthly. I
> disagree with the new increase because private doctors will not
> accept my plan in New York City. I am left with attending community
> health centers. Its not worth the increase and Empire Healthcare
> website does not help OBAMA providers with information on getting a
> list of doctors who accept their insurance.
>

> In addition, I cannot afford the monthly increase and if this
> proposal is approved I will cancel my health plan with this provider.

>
> Sincerely,

>
> [REDACTED]
> Identification Number # [REDACTED]

----- Forwarded by [REDACTED] on 07/08/2014 12:00 PM -----

[REDACTED] wrote on 06/30/2014 01:59:55 PM:

> From: [REDACTED]
> To: <PremiumRateIncreases@dfs.ny.gov>,
> Date: 06/30/2014 02:00 PM
> Subject: Empire Blue Cross Blue Shield Premium Rate Change
> # [REDACTED]-00
>
> NYS Department of Financial Services
> Health Bureau - Premium Rate Adjustments
>
> Re: Empire HealthChoice HMO, Inc. - (Anthem) This is individual coverage.

>
> I definitely disapprove of another rate increase for me, this
> is the second one this year. I cannot afford it. I am a single man
> making only \$21,275 a year. If these rate increases continue I have
> to drop out then I will have no insurance. Their rates are too high
> now, I now pay \$456.88 for one person, can they eliminate vision and
> make it much cheaper? I will appreciate anything you can do in this
> matter for me to not increase my rate.
> Empire should reduce my rate will the salary I'm making.

>
> Thank You,
>
> Sincerely Yours,
>

[REDACTED]

----- Forwarded by [REDACTED] on 07/08/2014 12:00 PM -----

[REDACTED] wrote on 06/30/2014 02:10:39 PM:

> From: [REDACTED]
> To: "PremiumRateIncreases@dfs.ny.gov" <PremiumRateIncreases@dfs.ny.gov>,
> Cc: "gov.cuomo@chamber.state.ny.us" <gov.cuomo@chamber.state.ny.us>,
> Linda Rosenthal <RosentL@assembly.state.ny.us>,
> "gottfrr@assembly.state.ny.us" <gottfrr@assembly.state.ny.us>,
> "jcong@hotmail.com" <jcong@hotmail.com>, "holyman@nysenate.gov"
> <holyman@nysenate.gov>
> Date: 06/30/2014 02:10 PM
> Subject: Deny Empire's Premium Rate Increase

>
> NYS Department of Financial Services
> Health Bureau - Premium Rate Adjustments
> One State Street
> New York, NY 10004

June 30,

>
> Dear Superintendent Benjamin M. Lawsky,
>
> The application for an 18.4% rate increase by the Empire
> HealthChoice HMO represents an egregious abuse by a NY State
> approved health insurance provider and must be denied.
>
> In January, 2014 I purchased individual coverage from Empire
> HMO, Inc. My HIOS identification number is [REDACTED]
> [REDACTED] Now only five months later, I received notice of
> their request for a rate hike of 18.4%.
>
> I chose Empire because it is what I can afford, but it resulted in
> my losing my primary care physician and specialists and required a
> difficult search for new doctors. Secretaries who at first confirmed
> that their physicians were on my Empire plan, soon after said that
> they were not. If you approve this increase, I would be obliged to
> leave Empire and would probably once again lose these new doctors,
> hoping that I would be able to find others who are associated with
> the new plan. Does NY State's iteration of the Affordable Care Act
> advocate for continuity of care and affordability for the consumer?
>
> Responsibility for my father's total care limits my financial
> resources so that, as hard working as I am, I am financially
> stretched and rely on your conscience, consideration and sense of
> fairness. While our country has embarked on a more affordable and
> inclusive health system, please do not let its aims be eroded by the
> insurance industry's greed that in my case would squeeze the middle
> class beyond endurance. Profiteers are heavily represented by
> lobbyists, but who represents the public?
>
> Please deny Empire any rate increase. Its increased membership
> should make it more possible to maintain their current rate. I look
> forward to hearing your decision.

> Sincerely,
>

[REDACTED]
>
> Cc
> Governor Andrew Cuomo gov.cuomo@chamber.state.ny.us
> Assemblywoman Linda Rosenthal RosentL@assembly.state.ny.us
> Assemblyman Richard Gottfried gottfrr@assembly.state.ny.us
> Representative Jerrold Nadler Jcong@hotmail.com
> State Sen. Brad Holyman holyman@nysenate.gov
>
>
>

----- Forwarded by [REDACTED] on 07/08/2014 12:00 PM -----

NYS Department of Financial Services <portal@dfs.ny.gov> wrote on 06/30/2014
03:10:38 PM:

> From: NYS Department of Financial Services <portal@dfs.ny.gov>
> To: PremiumRateIncreases@dfs.ny.gov,
> Date: 06/30/2014 03:10 PM

> Subject: Prior Approval Submission

>

> Empire HealthChoice HMO, Inc.

>

> individual

>

> hmo

>

> [REDACTED]

> [REDACTED]

> [REDACTED]

> [REDACTED]

> [REDACTED]

>

> The increase of %18.4 is too great. My coverage is less than I had

> before my o [REDACTED] scontinued in 2013. It is wrong.

----- Forwarded by [REDACTED] on 07/08/2014 12:00 PM -----

[REDACTED] wrote on 06/30/2014 03:16:43 PM:

> From: [REDACTED] >

> To: <PremiumRateIncreases@dfs.ny.gov>,

> Date: 06/30/2014 03:17 PM

> Subject: Comment on rate increase

>

>

> [REDACTED] ealthChoice HMO

> [REDACTED]

> Indivi

> HIOS# [REDACTED]

>

> It is a huge increase of 18.4% for 2015. Many doctors were not

> available until late May when they finally qualified. I have fewer

> benefits on this plan than the insurance I lost when my other health

> insurer discontinued some plans in 2013.

> It is simply too much, too soon.

> I pay at the top level for insurance.. I think this is the largest

> percentage increase being asked for.

> It is just wrong.

> [REDACTED]

>

>

>

>

>

>

----- Forwarded by [REDACTED] on 07/08/2014 12:00 PM -----

NYS Department of Financial Services <portal@dfs.ny.gov> wrote on 06/30/2014 05:57:18 PM:

> From: NYS Department of Financial Services <portal@dfs.ny.gov>

> To: PremiumRateIncreases@dfs.ny.gov,

> Date: 06/30/2014 05:57 PM

> Subject: Prior Approval Submission

>

> Empire HealthChoice HMO, Inc.

>

> individual

>

> hmo

>

[REDACTED]

[REDACTED]

[REDACTED]

>

> I am a current member, via the NY State of Health (Affordable Care
> Act) , of Empire Platinum Guided Access Pathway X Enhanced (ceaf). I
> am a single person paying a very substantial \$620 a month, and am
> completely stunned that NY State would permit an 18% increase to
> well over \$700 a month for a single person. Isn't this the
> antithesis of what President Obama is attempting to accomplish? This
> is not affordable healthcare. More specific to Empire Blue Cross, I
> can tell you that they require a cumbersome faxing process for
> Specialist Care referral which discourages proper diagnosis of
> medical conditions. There is NO dedicated support for Primary Care
> administrators to get assistance with referral questions. This kind
> of paperwork should all be done On Line, it is the year 2014. I have
> had SIGNIFICANT trouble and outright rejections of fully legitimate
> claims that Empire refuses to reimburse. I see absolutely NO REASON
> to award an 18% increase immediately after Year 1 of the Affordable
> Care Act - it is a gross dismissal of individual affordability and
> simply fattens corporate revenue at the expense of Working
> individuals and families, which is the exact Opposite result
> promised by _____ s.

----- Forwarded by [REDACTED] on 07/08/2014 12:00 PM -----

[REDACTED] > wrote on 06/30/2014 06:17:02 PM:

> From: [REDACTED] >

> To: [REDACTED] > ,

> Date: 06/30/2014 06:17 PM

> Subject: Disputed Rate Increase Charge

>

> To Whom It May Concern:

>

> I am [REDACTED], my insurer is Empire HealthChoice HMO, Inc. I
> have individual coverage, my HIOS is [REDACTED]-00.

>

> I received a letter stating that my premium insurance rate has been
> submitted for a rate increase of 10.8%. My current monthly premium
> is \$425.39. I am writing this letter to dispute my rate increase
> and ask that you not increase my premium, especially since my
> coverage is minimal. My policy is for individual coverage with no
> dental or eye coverage, and minimal laboratory coverage.

>

> I thank you for your time and consideration with my request.

>

> Sincerely

> [REDACTED]

----- Forwarded by [REDACTED] on 07/08/2014 12:00 PM -----

[REDACTED] > wrote on 06/30/2014 07:10:06 PM:

> From: [REDACTED] >

> To: <PremiumRateIncreases@dfs.ny.gov> ,

> Date: 06/30/2014 07:10 PM

> Subject: Extreme Health Insurance Rate Increase 17% ..:(:(...!!

>
> My name is [REDACTED]
> Empire HealthChoice HMO, Inc.
> They requested I give you this # [REDACTED] although it is not
> the member # on my card.
> Empire Bronze GuidedAccess
>
> I am 63 years old. I have been working steadily since I was 14 yrs
> old (over 40 yrs). I am now Unemployed since November do to the
> company I worked for for 30 years closing. I was collecting
> unemployment for the FIRST TIME in my life and have never been on
> welfare or any assistance program. My 26 weeks Unemployment has
> ended, with no extension in sight. I have been actively job hunting
> for 7 months but at my age it is so very hard to find employment.
> I chose the cheapest B/C plan I could with a VERY HIGH
> deductible .. and now I am getting a 17% raise in premiums without
> ever using the insurance or going to the doctor (I cost them not
> one penny yet paid all my premiums on time). I will be receiving
> far LESS income in 2015 than I did in 2014 due to my job loss and no
> unemployment extension. With less income how is a 17% raise
> allowable. When I applied to NYS Marketplace I did not even list all
> my Income Tax deductions. So I truly wish this Large Increase Looked
> into...
> Thank you so very much for your help.
> Sinc
> [REDACTED]

----- Forwarded by [REDACTED] on 07/08/2014 12:00 PM -----

[REDACTED] wrote on 06/30/2014 07:12:21 PM:

> From: [REDACTED]
> To: <[REDACTED]>,
> <premiumrateincreases@dfs.ny.gov>,
> Date: 06/30/2014 07:12 PM
> Subject: Individual Policy with Extreme Health Insurance Rate
> Increase 17% ...:(...!!
>
>
>

> -----O
> From: [REDACTED]
> To: PremiumRateIncreases <PremiumRateIncreases@dfs.ny.gov>
> Sent: Mon, Jun 30, 2014 7:10 pm
> Subject: Extreme Health Insurance Rate Increase 17% ...:(...!!

> My name is [REDACTED]
> Empire HealthChoice HMO, Inc. LICY
> They requested I give you this # [REDACTED] although it is not
> the member # on my card.
> Empire Bronze GuidedAccess
>
> I am 63 years old. I have been working steadily since I was 14 yrs
> old (over 40 yrs). I am now Unemployed since November do to the
> company I worked for for 30 years closing. I was collecting
> unemployment for the FIRST TIME in my life and have never been on
> welfare or any assistance program. My 26 weeks Unemployment has
> ended, with no extension in sight. I have been actively job hunting
> for 7 months but at my age it is so very hard to find employment.
> I chose the cheapest B/C plan I could with a VERY HIGH

> deductible .. and now I am getting a 17% raise in premiums without
> ever using the insurance or going to the doctor (I cost them not
> one penny yet paid all my premiums on time). I will be receiving
> far LESS income in 2015 than I did in 2014 due to my job loss and no
> unemployment extension. With less income how is a 17% raise
> allowable. When I applied to NYS Marketplace I did not even list all
> my Income Tax deductions. So I truly wish this Large Increase Looked
into...

> Thank you so very much for your help.
> Sinc
> [REDACTED]

----- Forwarded by [REDACTED] on 07/08/2014 12:00 PM -----

NYS Department of Financial Services <portal@dfs.ny.gov> wrote on 06/30/2014
08:28:43 PM:

> From: NYS Department of Financial Services <portal@dfs.ny.gov>
> To: PremiumRateIncreases@dfs.ny.gov,
> Date: 06/30/2014 08:28 PM
> Subject: Prior Approval Submission

> Empire HealthChoice HMO, Inc.

> individual

> hmo

> [REDACTED]

> [REDACTED]

> [REDACTED]

> I have empire platinum guided access ceaf, HIOS id [REDACTED]
> This is an individual plan I got thru the NYS exchange. Even though
> I get money back from the exchange to off set the cost I do not
> believe Empire should get a rate increase of 18.4% as stated in a
> letter I received from them. There service is not be up to par. I
> had a claim in Jan for a lab that was process out of network when it
> should have been in. I started calling on 4/25 and as of today 6/30
> it has not be corrected and I spoken to at least 10 different reps.
> This is unacceptable. And this is not the only issues. How can you
> ask for a raise when you cant even get your house in order. It is
> hard enough paying for the current rate and co pays etc. an
> increase would be a burden.



To:
Cc:
Bcc:
Subject:

----- Forwarded by [REDACTED] on 07/08/2014 12:04 PM -----

[REDACTED] wrote on 06/05/2014 10:04:07 PM:

> From: [REDACTED]
> To: PremiumRateIncreases@dfs.ny.gov,
> Date: 06/05/2014 10:04 PM
> Subject: Proposed Rate Increase
>
> Note: I have sending this letter on beh [REDACTED]; he does
> not have a computer. I am his neighbor [REDACTED] indly
> ew and expedite, p [REDACTED]
> [REDACTED].doc" [REDACTED]

----- Forwarded by [REDACTED] on 07/08/2014 12:04 PM -----

[REDACTED] > wrote on 06/23/2014 10:20:15 AM:

> From: [REDACTED] >
> To: <premiumrateincreases@dfs.ny.gov>,
> Date: 06/23/2014 10:20 AM
> Subject: Empire BlueCross BlueShield
>
> Gentlemen:
>
> This move by Empire BlueCross BlueShield to increase premiums by
> approximately 17.9% is totally ludicrous. The purpose of the
> Marketplace is to provide insurance to those (a) who cannot afford
> private insurance or (b) whose employers do not provide medical
> insurance. Those who fall under category (a) will have an even
> greater burden (or impossibility) in affording medical insurance and
> regarding (b) how many CEO's of corporations or even their employees
> get a 17.9% salary increase?
>
> The Empire notice cites the rising cost of medical care, and whose
> fault is that? The Medical Insurance Companies are making huge
> profits which they are NOT sharing with the doctors on their
> respective plans, but are instead keeping most of it for themselves
> and giving the rest to their shareholders.
>
> How is any of this fair or even reasonable? This totally defeats
> the concept of affordable medical care and it is unconscionable.
>
> Please do not approve their request!
>
> Respectfully,
>
> [REDACTED]

----- Forwarded by [REDACTED] on 07/08/2014 12:04 PM -----

[REDACTED] wrote on 06/24/2014 10:19:48 AM:

> From: [REDACTED] >
> To: <PremiumRateIncreases@dfs.ny.gov>,

> Date: 06/24/2014 10:19 AM
> Subject: Empire Blue's propsoed 2015 Rate Increase
>
> Hello,
> I wanted to submit a comment to their proposal. Empire has done
> nothing but disseminate misinformation since the Health Exchange
> plans were first posted last fall.
>
> Prior to selecting a plan I called each of them and a rep from
> Empire told me that all of my doctors were in the plan. It turns
> out that NONE of them were and I was
> forced to select new doctors. Further, I was told that I would be
> given additional assistance with my annual deductible from NYS but
> Empire now tells me that is not the case.
>
> Before they are granted any rate hike, they should be made
> accountable for all of the misinformation they continue to distribute.
>
>
> [REDACTED]
----- Forwarded by [REDACTED] on 07/08/2014 12:04 PM -----

[REDACTED] > wrote on 06/25/2014 10:07:19 AM:

> From: [REDACTED] >
> To: <PremiumRateIncreases@dfs.ny.gov>,
> Date: 06/25/2014 10:07 AM
> Subject: Empire BlueCross BlueShield Proposed Rate Change
>
> Dear Commissioner Lawsky,
>
> I am writing to you in complete opposition of Empire BlueCross
> BlueShield getting another rate increase. My premium was just
> increased this January, 2014 to \$662.76. When I received this
> proposed rate change letter stating my premium would go up to \$713.
> 13, if approved, I knew I had to send this email immediately.
>
> As a senior citizen, on a fixed income, I cannot see why this
> company would need another increase so soon. What could they have
> done or what additional expenses could they have incurred, in such a
> short period of time, to warrant another increase? This is totally
> outrageous to me!
>
> So, I am asking you, Commissioner Lawsky, to deny Empire this rate
> increase. Please think about all the senior citizens, such as
> myself, who are on fixed incomes that are being strangled by these
> ever increasing rates.
>
> Thank you for your time and consideration to this matter.
>
> Yours truly,
> [REDACTED]
----- Forwarded by [REDACTED] on 07/08/2014 12:04 PM -----

[REDACTED] wrote on 06/26/2014 04:30:35 PM:

> From: Consumers/NRES/NYC/SIDNY
> To: Premium Rate Increases - Public Comments/nyc/nysdfs@NYSDFS,
> Date: 06/26/2014 04:30 PM
> Subject: Fw: NYS Department of Financial Services Consumer

> Assistanc
> Sent by: [REDACTED]
>
>
> New York State Department of Financial Services
> Consumer Assistance Unit
> One Commerce Plaza
> Albany, NY 12257
> 800-342-3736 (Consumers Hotline)
> 518-474-6600 (Outside of NYS)
> 518-474-2188 (Fax)
>
>
> ----- Forwarded by [REDACTED] on 06/26/2014 04:30 PM -----
>
> From: [REDACTED] Insurance Inquiry <[REDACTED]>
> To: <[REDACTED]>,
> Date: 06/24/2014 03:56 PM
> Subject: NYS Department of Financial Services Consumer Assistance Unit
Inquiry
>
>
> Dear [REDACTED]:
>
> Your inquiry submitted to the NYS Department of Financial Services
> Consumer Assistance Unit has been received and will be reviewed promptly.
>
> The information you entered is as follows:
>
> Your Na [REDACTED]
> Email: [REDACTED]
> Address: [REDACTED]
>
> Your Company/Organiz [REDACTED]
> Daytime Telephone#: [REDACTED]
> You are a(n): CONSUMER
> Type of Insurance question/comment: HEALTH
>
> Your Questions and/or Comments have been recorded as follows:
>
> * * * * *
>
> Please forward this to the proper department. Thank you...
>
> Please do not approve Empire Blue Cross "RATE INCREASE" for 2015.
> They want an increase of 18.4% and if approved, my wife will not be
> able to afford health insurance any longer. She pays \$409 now and
> the \$75 increase can not be permitted. Social Security which is our
> only income increases 1.5% so approve only the same amount that YOUR
> government increases OUR social security... STOP the health
> insurance companies from these outrageous annual rate increases..
PLEASE!!!!
>
> * * * * *
>
>
> Sincerely,
>
> New York State Department of Financial Services
> Consumer Assistance Unit.

> email at: consumers@dfs.ny.gov
>

----- Forwarded by [REDACTED] on 07/08/2014 12:04 PM -----

[REDACTED] > wrote on 06/28/2014 11:13:26 AM:

> From: [REDACTED] >
> To: "PremiumRateIncreases@dfs.ny.gov" <premiumrateincreases@dfs.ny.gov>,
> Date: 06/28/2014 11:13 AM
> Subject: Monthly notice/proposed rate increase

> Gentlemen:

> Every month I receive a letter from Empire Blue Cross Blue Shield
> dated 2 or 3 days before the end of the month which states:

> In accordance with the provisions of the Affordable Health Care Act
> (ha, ha) we must notify you that if your premium payment is not
> received by the end of coverage month your insurance is cancelled
> and any claims for that month will not be honored.

> The postage for this enlightening message is 40 cents and lets say
> the cost of the paper and printing raises the monthly cost to 45
> cents per subscriber or \$5.40 per year.

> While I do not know how many subscribers Blue Cross Blue Shield has;
> and for argument's sake lets say 20 million, the cost of this
> notice alone is \$ 108 million annually.

> It is no wonder a rate increase is requested; I am sure this is but
> one of many small inefficiencies required by the "Affordable Care Act".

> Very truly yours,

> [REDACTED]
----- Forwarded by [REDACTED] on 07/08/2014 12:04 PM -----

[REDACTED] > wrote on 06/30/2014 03:21:11 PM:

> From: [REDACTED]
> To: "premiumrateincreases@dfs.ny.gov" <premiumrateincreases@dfs.ny.gov>,
> Date: 06/30/2014 03:21 PM
> Subject: FW: RE HIOS [REDACTED]

> From: [REDACTED]
> Sent: Monday, June 30, 2014 2:47 PM
> To: premiumratein
> Subject: RE HIOS [REDACTED]

> I received the attached rate increase notification. You will
> notice that at the bottom of page one is states there will be cost
> sharing changes but does not specify the changes. I think that
> the comment period shouldn't start until Blue Cross discloses those
> changes. June 18th notification is incomplete and therefor does
> not fulfill the legal disclosure requirements.

> Thank you very much

>

> [REDACTED] ate_increase_2015.pdf" deleted by

>

----- Forwarded by [REDACTED] on 07/08/2014 12:04 PM -----

[REDACTED] > wrote on 06/30/2014 07:42:18 PM:

> From: [REDACTED] >

> To: <PremiumRateIncreases@dfs.ny.gov>, <[REDACTED]> ,

> Date: 06/30/2014 07:42 PM

> Subject: Regarding premium increase

>

> To Whom it May Concern,

>

> I was recently mailed a letter stating that Empire BlueCross Blue
> Shield was increasing their monthly payments. However, I originally
> chose this plan because it is the best plan I can afford. All of my
> doctor's belong to this plan as well. I cannot afford \$403.00
> monthly. I am going to dispute this increase because I cannot afford
> the payments. Half of my pay check will go to my insurance. I do
> have other expense that I need money for; I need money to live.

>

> Please call or email me if there are any problems. My number is

[REDACTED]

>

>

> [REDACTED]

>

> Thanks

>

> [REDACTED]

[REDACTED] Ave.
[REDACTED] NY 10032

I am a member of Empire Blue Cross Blue Shield [REDACTED]
Up to 02/01/13 my fee to Blue Cross was \$583.38.
As of 02/01/13 I paid \$600.87
That is an increase of \$17.49.
As of 02/01/14 I paid \$662.76, which is an increase of \$61.89.
This is the second increase that Blue Cross is demanding in less than six months, and it is impossible to grant them that increase.
I realize that medical costs are going up, but not that much that fast.

I am an 88 year old retired veteran of World War 11 and the older I get, the more medical attention I need. It is impossible for me to pay these constant increases. Please look at this situation from both sides and do not automatically go along with Empire Blue Cross.

Sincerely Yours,

[REDACTED]



To:
Cc:
Bcc:
Subject:

----- Forwarded by [REDACTED] on 07/08/2014 11:58 AM -----

NYS Department of Financial Services <portal@dfs.ny.gov> wrote on 06/15/2014 09:02:58 AM:

> From: NYS Department of Financial Services <portal@dfs.ny.gov>
> To: PremiumRateIncreases@dfs.ny.gov,
> Date: 06/15/2014 09:02 AM
> Subject: Prior Approval Submission

>
> Empire HealthChoice Assurance, Inc

>
> individual

>
> epo

> [REDACTED]

[REDACTED]

[REDACTED]

>
> An increase of 19.8% is not a sustainable increase for me. In no
> other realm of my living does such a percentage increase happen. I
> believe such a rate of increase will result in fewer customers - me,
> as an example. I trust that regulation by DFS will result in the
> strong mitigation of such a request. I had the same health insurance
> provider for over 20 years (NY Group Health Administrators), and
> rate increases such as this did not happen even back then (when
> there were annual increases in the healthcare industry). They should
> especially NOT happen now. For now they will jeopardize the
> Affordable Healthcare Act itself. I know this is challenging across
> the board, to every player (including me) involved. A much smaller
> increase, if necessary to sustain affordability to all, is
> acceptable. se is not.

----- Forwarded by [REDACTED] on 07/08/2014 11:58 AM -----

NYS Department of Financial Services <portal@dfs.ny.gov> wrote on 06/15/2014 09:59:41 AM:

> From: NYS Department of Financial Services <portal@dfs.ny.gov>
> To: PremiumRateIncreases@dfs.ny.gov,
> Date: 06/15/2014 09:59 AM
> Subject: Prior Approval Submission

>
> Empire HealthChoice Assurance, Inc

>
> individual

>
> epo

> [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

>
> My income is such that I can not afford a 20.4% increase in my
> monthly premium. Please review my financial records. I am covered by
> Excellus BC Thank you

----- Forwarded by [REDACTED] on 07/08/2014 11:58 AM -----

NYS Department of Financial Services <portal@dfs.ny.gov> wrote on 06/16/2014 03:28:40 PM:

> From: NYS Department of Financial Services <portal@dfs.ny.gov>
> To: PremiumRateIncreases@dfs.ny.gov,
> Date: 06/16/2014 03:28 PM
> Subject: Prior Approval Submission

>
> Empire HealthChoice Assurance, Inc
>
> individual
>
> other
>

[REDACTED]

[REDACTED]

[REDACTED]

>
> I can not pay any more than I am already paying. This policy is
> already expensive for me. If a rate increase was approved, it would
> be even har Please don't approve this rate increase!

----- Forwarded by [REDACTED] on 07/08/2014 11:58 AM -----

NYS Department of Financial Services <portal@dfs.ny.gov> wrote on 06/16/2014 08:31:32 PM:

> From: NYS Department of Financial Services <portal@dfs.ny.gov>
> To: PremiumRateIncreases@dfs.ny.gov,
> Date: 06/16/2014 08:31 PM
> Subject: Prior Approval Submission

>
> Empire HealthChoice Assurance, Inc
>
> individual
>
> healthyny
>

[REDACTED]

[REDACTED]

[REDACTED]

>
> Please don't allow these insurance companies to raise rates every
> year. It's already expensive, even with the state pitching in, so
> personally I don't know that we'll be able to continue to afford it.
> Beyond that, the state's share will go up as well, and we'd rather
> that money go to supporting our struggling schools than our bloated
> insurance company. AND, although I got a notice that my insurance

> company is raising rates, and that I'm required to input the name of
> my company, my plan, and my HIOS, my insurance company is not one of
> the ones li comments apply for any of them. Thank you.
---- Forwarded by [REDACTED] on 07/08/2014 11:58 AM ----

NYS Department of Financial Services <portal@dfs.ny.gov> wrote on 06/18/2014 02:07:37 PM:

> From: NYS Department of Financial Services <portal@dfs.ny.gov>
> To: PremiumRateIncreases@dfs.ny.gov,
> Date: 06/18/2014 02:07 PM
> Subject: Prior Approval Submission
>
> Empire HealthChoice Assurance, Inc
>
> individual
>
> healthyny
>

> [REDACTED]
> [REDACTED]
> [REDACTED]

>
> I'm not sure what the purpose is of a "Comments" page is, where we
> can't see feedback from other people, beforehand - and can't
> particularly influence the outcome of any application by a given
> company, regardless. But it would be pretty clear to any normal
> consumer - much less a poor one - that a rate hike of over 20% isn't
> remotely reasonable (much less "fair" - that is not a cost-of-living
> increase). This is just a bald gambit for "recovering" the "lost"
> income imposed by the new health care policy. Let the insurance
> companies absorb it: they don't get to cry poor. To put it another
> way: if I could afford 'normal' health care, I wouldn't be using
> this program. What on earth makes a company think that users on a
> fixed incom s of almost 21% a year?

---- Forwarded by [REDACTED] on 07/08/2014 11:58 AM ----

NYS Department of Financial Services <portal@dfs.ny.gov> wrote on 06/19/2014 08:58:16 AM:

> From: NYS Department of Financial Services <portal@dfs.ny.gov>
> To: PremiumRateIncreases@dfs.ny.gov,
> Date: 06/19/2014 08:58 AM
> Subject: Prior Approval Submission
>
> Empire HealthChoice Assurance, Inc
>
> individual
>
> healthyny
>

> [REDACTED]
> [REDACTED]
> [REDACTED]

>
> I was shocked to say the least at the rate of the increase! I do not

> know of anyone who has received a 20.4% increase in their pay or in
> Social Security! The insurance companies should be ashamed! Now that
> we have to have insurance I think you are really taking advantage of
> the situation. I know I will not be able to keep my insurance if
> this goes into effect! The cost is so high NOW and the deductibles
> are outrages. I would rather put that money in an interest bearing
> account and use it for my own health care needs. I'm going to
> advocate for this I can assure you.



To:
Cc:
Bcc:
Subject:

----- Forwarded by [REDACTED] on 07/08/2014 12:04 PM -----

[REDACTED] wrote on 06/05/2014 10:04:07 PM:

> From: [REDACTED]
> To: PremiumRateIncreases@dfs.ny.gov,
> Date: 06/05/2014 10:04 PM
> Subject: Proposed Rate Increase
>
> Note: I have sending this letter on beh [REDACTED]; he does
> not have a computer. I am his neighbor [REDACTED] indly
> ew and expedite, p [REDACTED]
> [REDACTED].doc" [REDACTED]]

----- Forwarded by [REDACTED] on 07/08/2014 12:04 PM -----

[REDACTED] > wrote on 06/23/2014 10:20:15 AM:

> From: [REDACTED] >
> To: <premiumrateincreases@dfs.ny.gov>,
> Date: 06/23/2014 10:20 AM
> Subject: Empire BlueCross BlueShield
>
> Gentlemen:
>
> This move by Empire BlueCross BlueShield to increase premiums by
> approximately 17.9% is totally ludicrous. The purpose of the
> Marketplace is to provide insurance to those (a) who cannot afford
> private insurance or (b) whose employers do not provide medical
> insurance. Those who fall under category (a) will have an even
> greater burden (or impossibility) in affording medical insurance and
> regarding (b) how many CEO's of corporations or even their employees
> get a 17.9% salary increase?
>
> The Empire notice cites the rising cost of medical care, and whose
> fault is that? The Medical Insurance Companies are making huge
> profits which they are NOT sharing with the doctors on their
> respective plans, but are instead keeping most of it for themselves
> and giving the rest to their shareholders.
>
> How is any of this fair or even reasonable? This totally defeats
> the concept of affordable medical care and it is unconscionable.
>
> Please do not approve their request!
>
> Respectfully,
>
> [REDACTED]

----- Forwarded by [REDACTED] on 07/08/2014 12:04 PM -----

[REDACTED] wrote on 06/24/2014 10:19:48 AM:

> From: [REDACTED] >
> To: <PremiumRateIncreases@dfs.ny.gov>,

> Date: 06/24/2014 10:19 AM
> Subject: Empire Blue's propsoed 2015 Rate Increase
>
> Hello,
> I wanted to submit a comment to their proposal. Empire has done
> nothing but disseminate misinformation since the Health Exchange
> plans were first posted last fall.
>
> Prior to selecting a plan I called each of them and a rep from
> Empire told me that all of my doctors were in the plan. It turns
> out that NONE of them were and I was
> forced to select new doctors. Further, I was told that I would be
> given additional assistance with my annual deductible from NYS but
> Empire now tells me that is not the case.
>
> Before they are granted any rate hike, they should be made
> accountable for all of the misinformation they continue to distribute.
>
>
> [REDACTED]
----- Forwarded by [REDACTED] on 07/08/2014 12:04 PM -----

[REDACTED] > wrote on 06/25/2014 10:07:19 AM:

> From: [REDACTED] >
> To: <PremiumRateIncreases@dfs.ny.gov>,
> Date: 06/25/2014 10:07 AM
> Subject: Empire BlueCross BlueShield Proposed Rate Change
>
> Dear Commissioner Lawsky,
>
> I am writing to you in complete opposition of Empire BlueCross
> BlueShield getting another rate increase. My premium was just
> increased this January, 2014 to \$662.76. When I received this
> proposed rate change letter stating my premium would go up to \$713.
> 13, if approved, I knew I had to send this email immediately.
>
> As a senior citizen, on a fixed income, I cannot see why this
> company would need another increase so soon. What could they have
> done or what additional expenses could they have incurred, in such a
> short period of time, to warrant another increase? This is totally
> outrageous to me!
>
> So, I am asking you, Commissioner Lawsky, to deny Empire this rate
> increase. Please think about all the senior citizens, such as
> myself, who are on fixed incomes that are being strangled by these
> ever increasing rates.
>
> Thank you for your time and consideration to this matter.
>
> Yours truly,
> [REDACTED]
----- Forwarded by [REDACTED] on 07/08/2014 12:04 PM -----

[REDACTED] wrote on 06/26/2014 04:30:35 PM:

> From: Consumers/NRES/NYC/SIDNY
> To: Premium Rate Increases - Public Comments/nyc/nysdfs@NYSDFS,
> Date: 06/26/2014 04:30 PM
> Subject: Fw: NYS Department of Financial Services Consumer

> Assistanc
> Sent by: [REDACTED]
>
>
> New York State Department of Financial Services
> Consumer Assistance Unit
> One Commerce Plaza
> Albany, NY 12257
> 800-342-3736 (Consumers Hotline)
> 518-474-6600 (Outside of NYS)
> 518-474-2188 (Fax)
>
>
> ----- Forwarded by [REDACTED] on 06/26/2014 04:30 PM -----
>
> From: [REDACTED] Insurance Inquiry <[REDACTED]>
> To: <[REDACTED]> ,
> Date: 06/24/2014 03:56 PM
> Subject: NYS Department of Financial Services Consumer Assistance Unit
Inquiry
>
>
> Dear [REDACTED]:
>
> Your inquiry submitted to the NYS Department of Financial Services
> Consumer Assistance Unit has been received and will be reviewed promptly.
>
> The information you entered is as follows:
>
> Your Na [REDACTED]
> Email: [REDACTED]
> Address: [REDACTED]
>
> Your Company/Organiz [REDACTED]
> Daytime Telephone#: [REDACTED]
> You are a(n): CONSUMER
> Type of Insurance question/comment: HEALTH
>
> Your Questions and/or Comments have been recorded as follows:
>
> * * * * *
>
> Please forward this to the proper department. Thank you...
>
> Please do not approve Empire Blue Cross "RATE INCREASE" for 2015.
> They want an increase of 18.4% and if approved, my wife will not be
> able to afford health insurance any longer. She pays \$409 now and
> the \$75 increase can not be permitted. Social Security which is our
> only income increases 1.5% so approve only the same amount that YOUR
> government increases OUR social security... STOP the health
> insurance companies from these outrageous annual rate increases..
PLEASE!!!!!!
>
> * * * * *
>
>
> Sincerely,
>
> New York State Department of Financial Services
> Consumer Assistance Unit.

> email at: consumers@dfs.ny.gov
>

----- Forwarded by [REDACTED] on 07/08/2014 12:04 PM -----

[REDACTED] > wrote on 06/28/2014 11:13:26 AM:

> From: [REDACTED] >
> To: "PremiumRateIncreases@dfs.ny.gov" <premiumrateincreases@dfs.ny.gov>,
> Date: 06/28/2014 11:13 AM
> Subject: Monthly notice/proposed rate increase

> Gentlemen:

> Every month I receive a letter from Empire Blue Cross Blue Shield
> dated 2 or 3 days before the end of the month which states:

> In accordance with the provisions of the Affordable Health Care Act
> (ha, ha) we must notify you that if your premium payment is not
> received by the end of coverage month your insurance is cancelled
> and any claims for that month will not be honored.

> The postage for this enlightening message is 40 cents and lets say
> the cost of the paper and printing raises the monthly cost to 45
> cents per subscriber or \$5.40 per year.

> While I do not know how many subscribers Blue Cross Blue Shield has;
> and for argument's sake lets say 20 million, the cost of this
> notice alone is \$ 108 million annually.

> It is no wonder a rate increase is requested; I am sure this is but
> one of many small inefficiencies required by the "Affordable Care Act".

> Very truly yours,

> [REDACTED]
----- Forwarded by [REDACTED] on 07/08/2014 12:04 PM -----

[REDACTED] > wrote on 06/30/2014 03:21:11 PM:

> From: [REDACTED]
> To: "premiumrateincreases@dfs.ny.gov" <premiumrateincreases@dfs.ny.gov>,
> Date: 06/30/2014 03:21 PM
> Subject: FW: RE HIOS [REDACTED]

> From: [REDACTED]
> Sent: Monday, June 30, 2014 2:47 PM
> To: premiumratein
> Subject: RE HIOS [REDACTED]

> I received the attached rate increase notification. You will
> notice that at the bottom of page one is states there will be cost
> sharing changes but does not specify the changes. I think that
> the comment period shouldn't start until Blue Cross discloses those
> changes. June 18th notification is incomplete and therefor does
> not fulfill the legal disclosure requirements.

> Thank you very much

>

> [REDACTED] ate_increase_2015.pdf" deleted by

>

----- Forwarded by [REDACTED] on 07/08/2014 12:04 PM -----

[REDACTED] > wrote on 06/30/2014 07:42:18 PM:

> From: [REDACTED] >

> To: <PremiumRateIncreases@dfs.ny.gov>, <[REDACTED]> ,

> Date: 06/30/2014 07:42 PM

> Subject: Regarding premium increase

>

> To Whom it May Concern,

>

> I was recently mailed a letter stating that Empire BlueCross Blue
> Shield was increasing their monthly payments. However, I originally
> chose this plan because it is the best plan I can afford. All of my
> doctor's belong to this plan as well. I cannot afford \$403.00
> monthly. I am going to dispute this increase because I cannot afford
> the payments. Half of my pay check will go to my insurance. I do
> have other expense that I need money for; I need money to live.

>

> Please call or email me if there are any problems. My number is

[REDACTED]

>

>

> [REDACTED]

>

> Thanks

>

> [REDACTED]

[REDACTED] Ave.
[REDACTED] NY 10032

I am a member of Empire Blue Cross Blue Shield [REDACTED]
Up to 02/01/13 my fee to Blue Cross was \$583.38.
As of 02/01/13 I paid \$600.87
That is an increase of \$17.49.
As of 02/01/14 I paid \$662.76, which is an increase of \$61.89.
This is the second increase that Blue Cross is demanding in less than six months, and it is impossible to grant them that increase.
I realize that medical costs are going up, but not that much that fast.

I am an 88 year old retired veteran of World War 11 and the older I get, the more medical attention I need. It is impossible for me to pay these constant increases. Please look at this situation from both sides and do not automatically go along with Empire Blue Cross.

Sincerely Yours,

[REDACTED]