

June 27, 2014

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

1. *Comments on proposed rate change by Empire Healthchoice Assurance Inc.*
2. *Benefit plan is Empire Essential Guided Access Plan with HSA (small group coverage).*
3. *Health insurance oversight system identification number (HIOS ID number which is [REDACTED])*

*Dear Sir/Madam:*

*This letter is being written in response to the notice received from Empire Blue Cross Blue Shield Insurance notifying a proposed premium rate increase of 21.7%. The reasons given are rising cost of medical care, a new pool of customers, a new provider networks, change to the taxes and federal transitional reinsurance program. I believe this is an excessive rate hike given that the basic premium presently is quite high when compared to other insurances. Also, this is an HSA plan wherein the first 2,000 dollars are paid by me as a deductible with a high copayment. after the deductible is met. The basic premium should be less than what I am paying presently given that there is a high deductible in my plan. The proposed rate is almost 21%, which is 1/5 of the present rate and this will put pressure on a small business like me wherein there is a consideration whether to offer health insurance to an employee or terminate his/her services as the insurance may not be affordable by the small business group.*

*In regards to the pool of new customers, there should not be any major difference as these are similar group which have been traditionally a part of a healthy working group. There is no addition of any Medicaid benefits to this small business group and hence I do not agree with Empire Blue Cross Blue Shield's reasoning that the pool of new customers are more sick or in need of more medical needs than in the past.*

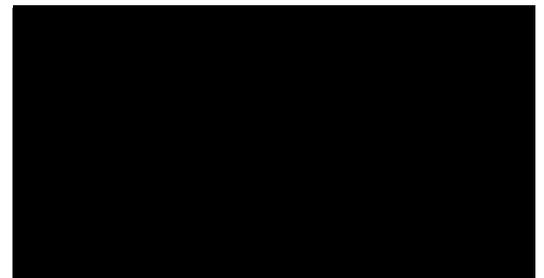
*Continued...*

*In regards to the reasoning of new providers, I, as a provider, have noticed a decrease in the reimbursement from these insurance carriers rather than any increase in the reimbursement for the medical services provided to the patients who carry this insurance. Hence, I do not agree with the reasoning that having new providers is increasing the cost of insurance.*

*In regards to change in taxes and federal transitional reinsurance program, I believe the federal government and the state government is adequately reimbursing these insurance companies to implement The Affordable Care Act within the guidelines and these taxes have not changed drastically since last year with the implementation of Affordable Care Act.*

*I hope some of the points that I have discussed here are taken into consideration when reviewing the request for increasing the premiums of my medical insurance by Empire Blue Cross Blue Shield. I believe that small business groups should be encouraged to offer medical insurance to all their employees with a cheaper and affordable health insurance, which are not financial burden to small business groups.*

*Sincerely,*





[To:](#)  
Cc:  
Bcc:  
Subject: Fw: Prior Approval Submission

----- Forwarded by [REDACTED] on 07/08/2014 12:03 PM -----

NYS Department of Financial Services <portal@dfs.ny.gov> wrote on 06/23/2014 03:49:35 PM:

> From: NYS Department of Financial Services <portal@dfs.ny.gov>  
> To: PremiumRateIncreases@dfs.ny.gov,  
> Date: 06/23/2014 03:49 PM  
> Subject: Prior Approval Submission  
>  
> Empire HealthChoice HMO, Inc.  
>  
> group  
>  
> healthyny  
>  
> [REDACTED]

[REDACTED]  
I disagree with the proposed rate increase. My small group can  
> barely make the monthly premiums charged. Currently, we are 3 adults  
> using the insurance plan my self, my wife and 23 year old son the  
> total premium for us is almost \$1379/month plus a \$1200 deductible.  
> Any increase will force us to drop the plan altogether.



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]