RECEIVED

JUL 02 2014

HEALTH BUREAU
N.Y.C. OFFICE

July 1, 2014

NYS Department of Financial Services
Health Bureau- Premium Rate Adjustments

Re: Comments for United HealthCare/Oxford Health Proposed 2015 Premium Rate Increase of 15.8%

Dear Sir or Madam:

On behalf of the National Student Nurses Association Inc. (NSNA) I write to submit comments in reference to the proposed premium rate increase for 2015 as recently requested by United HealthCare/Oxford Health. NSNA was informed of this proposed increase through a letter, **"Notice of Proposed Premium Rate Change G EPO $50 F Non-Gated OHI,** [redacted]" dated June 13, 2014.

United HealthCare/Oxford Health has been our health insurance carrier since 2012 and as the following data shows, the annual double digit increases are unconscionable and unsustainable to small businesses with limited resources such as NSNA.

B. Weighted Average Annual Percentage Requested Adjustments*:

	2014 to 2015
Requested Rate Adjustment	15.8%

C. Weighted Average Annual Percentage Requested Adjustments for each of the Past Three Years [If Applicable]*:

	2011 to 2012	2012 to 2013	2013 to 2014
Average Rate Adjustment	22.1%	18.9%	N/A

(Source: United Healthcare Northeast, Exhibit 13: Numerical Summary, page 3)

Although the above "Requested Adjustments" shows N/A for 2013 to 2014, Oxford levied a 15% rate increase to NSNA beginning June 1, 2014.

Our employees face growing pressure from constantly rising co-payments. They are reluctant to go to the doctor, the pharmacy or the hospital. If this proposal is accepted by NYS Department of Financial Services, it will pose an undue financial burden on NSNA. the organization may have to consider eliminating this most coveted of employment benefit

or passing the premium increase directly to each employee at a time when the economy remains uncertain and families are financially strapped.

I ask that you carefully scrutinize the United Healthcare Rate Proposals as well as their Balance Sheet, Officer Compensation and equities.

In it's January 16, 2014 News Release (copy enclosed), United Healthcare reported Revenues of $113.8 billion and $103.4 billion for 2013 and 2012 respectively; and Earnings from Operations of $7.3 billion and $7.8 billion in 2013 and 2012 respectively.

How can a company with such vast amount of Earnings from Operations (profits) over the at least last two years, and $32.1 billion in consolidated reserves (shareholders' equity) as of December 31, 2013 justify such an increase, especially at a time when people are struggling? I encourage you to review United Healthcare/Oxford and it's parent company, United Health Group's financial reports; it would clearly show that the proposed increase is unwarranted and unjustified. I encourage you to particularly look at the salaries and benefits, especially of the top executives; are they appropriate for a health industry organization?

NSNA strongly urges you to deny this proposed increase as it would be a burden on our $3 million budget. Although we want to do the best for our employees, this additional financial challenge may force us to reconsider this benefit. Surely other small businesses are faced with a similar hardship.

Thank you for considering these comments.

Sincerely yours,

[redacted]

[redacted]

June 19th, 2014

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

NYS Department of Financial Services
Health Bureau – Premium Rate Adjustments

Dear Sir / Madam,

Please explain how it is possible for any business to seek to get away with increasing pricing by double digit percentages every year? In any other business, customers would walk. I cannot believe that having seen our individual premiums rise from around $700 in 2013 to $840 today, the insurance company is proposing yet another 12% increase in premium for 2015! Where on earth are these increases being diverted to? All the while deductibles go up, in-network benefits shrink, out of network penalties multiply. What on earth is going on in NY? We as a small business have not figured out how to perpetually charge more and provide less. Somehow these insurance companies want to get away with it all the time. Please consider very carefully the latest request of the following plan before you grant them yet another increase:

Oxford Health Insurance, Inc. (OHI)
Small Business Group Coverage

Yours faithfully,

June 27, 2014

New York State Department of Financial Services
Health Bureau – Premium Rate Adjustments

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

RE: Premium Rate Increases

Insurer: United Healthcare (Oxford Health)
Plan Name:
Group Coverage
Proposed increase:

On behalf of NRLA-NY, which represents 369 member companies, including independent lumber and building material dealers, manufacturers, wholesalers, distributors, and other associated businesses in the state of New York who employ over 12,000 New York State residents, I would like to register our objections to the requested rate increase for health insurance by United Healthcare (Oxford Health). These rate increases are extremely dramatic and create a further drag on the New York economy. Our members, as small business providers, struggle with the ever increasing costs associated with providing employer based health insurance. We are additionally assessing how the Affordable Care Act will alter the health insurance landscape and our requirements as employers. Nonetheless, the one thing that small businesses like ours cannot continue to shoulder is the ever increasing rate increase requests from insurance providers.

The insurance industry is one of the most profitable industries in the United States. Their profits continue to rise while many American businesses, especially in the housing and construction industry, struggle to survive. If these rate increases are approved, it would further push an unnecessary weight onto the shoulders of small businesses, forcing many of us to drop coverage for our employees, something we loathe. Our businesses understand the importance of health insurance and cares about our employees, but with increases such as this we can easily be forced to decide between dropping coverage and reducing our workforce.

Therefore, we strongly urge you to reject the rate increase requests by United Healthcare (Oxford Health). Acceptance of these rate increases will not help the people of New York, small businesses and their employees, nor will it provide them with affordable insurance; it will only increase the profits of the insurance industry

Thank you for your time and consideration.

Sincerely,

July 7, 2014

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

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

Re: Oxford Health Insurance, Inc.
Name of Insurer: United Healthcare/Oxford
[redacted]

Dear Sir/Madam:

I am in receipt of a Notice of Proposed Premium Rate Change by United Healthcare dated June 13, 2014. I am writing to voice my strong opposition to the requested rate changes. My continued health insurance increases have prompted my family to postpone medical care that is needed due to the increasing costs. Every year for the past 3 years, my health insurance premiums, deductibles, co-pays and out of pocket expenses have increased significantly and much greater than inflation and much greater than any raises my family has received. The tremendous increase in rates requested by United Healthcare (between 15.6% and 15.7% for the first two quarters of 2015 – essentially a 30% annual increase) would be a significant hardship to my family and will certainly affect our medical decisions in the future, which is counter to the point of healthcare since postponing necessary medical care will increase costs to the insurer down the road if some treatable, yet debilitating or terminal illness is missed in its early treatable stages.

As the consolidation of health insurance companies has reduced the local marketplace to essentially one carrier, it is creating a monopoly situation of price fixing that is extremely detrimental to consumers and business owners. I therefore respectfully ask that United Healthcare's request for proposed premium rate changes be denied in full.

Sincerely, [redacted]

RECEIVED

JUL 11 2014

HEALTH BUREAU
N.Y.C. OFFICE

7/7/14

To Financial Services

When is the madness in this state going to stop. I havent had a raise in almost 10 years. Any raise goes to my medical coverage, which now has higher deductibles and no prescription plan. And lets not forget all the new hidden taxes like the N.Y.S. Mandated Surcharge.

In the past I have tried to save my insurance company payments for services that I thought were unwarranted. My CoPay for a E.R. visit was returned by the hospital because of poor services. I tried to get my insurance company to fight the second E.R. charges, they had no intrest. This was during the time that I had a different insurance company.

Recently after a operation I was in the I.C.U. for approximately 3 days longer because they had no bed for me. I laid there in limbo for those days.

The difference between the two rooms are $10,000 for ICU And $6,000 for the other. But again don't rock the boat, one hand washes the other and both hands wash the face of a iron fisted Government.

[redacted]

RECEIVED

JUL 23 2014

HEALTH BUREAU
N.Y.C. OFFICE

July 12, 2014

To whom it may concern:

Our company is Big Sue LLC. We have United Heath Care Oxford- Standard [redacted] We have small group coverage.
The proposed increase of over 12% is outrageous. We would need to completely reevaluate our coverage if this proposal went through. We are outraged that such a large increase is being proposed. AND THEN you put it on the customers to write letters and call to let you know what we think of the massive increase proposal?
We are against the increase. We are outraged that after one year you would pull the rug out from underneath us and propose such an increase.

Sincerely,

[redacted]

[redacted]

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AUG 11 2014
HEALTH BUREAU
N.Y.C. OFFICE

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 – UnitedHealthcare of New York, 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 decrease of 5.8% for the individual market and a rate increase of 16% for its small group market plans, respectively, filed by UnitedHealthcare of New York, Inc. and United Healthcare Insurance Company of New York, (collectively "United") 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

[1] These rate increase applications were submitted on or about July 2, 2014. Specific references refer to SERFF file number: UHLC-129581478 (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

protection. HCFANY urges DFS to review United's proposed decrease carefully to determine if it is appropriate. 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.[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-medicares-spending-slowdown-continue/.

[4] Medical Cost Trend: Behind the numbers 2015, PricewaterhouseCoopers, available at http://pwchealth.com/cgi-local/hregister.cgi/reg/pwc-hn-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.

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[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-2015/.

[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://www.washingtonpost.com/wp-srv/politics/documents/medicare-report/1229/#text/p63, 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/reportpub/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

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[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.

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

[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 United's rate application are described below.

II. Specific Issues in United's Rate Application

HCFANY urges the DFS to consider all of the above factors when reviewing United's rates. Further, the DFS should be mindful that United's 2014 rates are substantially higher than all others in the individual markets, as it reviews this rate adjustment application. The United 2014 New York City platinum-level plan prices are already between 144% and 204% more expensive than the next most expensive and lowest cost plans, respectively.[22] DFS should consider whether United's proposed decrease of 5.8% is sufficient. Moreover, United does not provide a clear justification for the significant discrepancy of its proposed rate decrease in its individual and the rate increase in its small group products (-5.8% vs. 16%). Additionally, United's actuarial memo and Exhibit 18 (the Index Rate and Plan Level Adjustment Worksheet) raise the following specific concerns.

A. The Initial Index Rate Factor

United's initial index rate factor of $416.63 is significantly higher than nearly all of the individual market applications filed with DFS to sell Individual On-Marketplace products in 2015.[23] This rate is nearly 1.5 times the average base rate ($324) of all the other on-Marketplace carriers. Because United's base rate is so high, DFS should be mindful that even with United's proposed decrease, its rates may remain disproportionately high as compared with other plans, as described above. DFS should consider closely the justification for using this relatively high initial index rate as it reviews the United application.

B. The Annual Medical Trend

In addition to a high initial index rate, United cites a trend increase of 10.9% for its individual and small group plans, which is among the highest of any carrier in either market.

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

[22] United's New York City platinum-level plan is $896.39. The next most expensive platinum-level plan is Empire Blue Cross at $620.69. The lowest cost New York City platinum-level plan is Metro Plus' PlatinumPlus-P1 plan, which is $443.24.

[23] United's proposed Initial Index Rate Factor of $416.63 is lower only than Empire's Initial Index Rate Factor of $437.53. *See* Exhibit 18, line 10.

This rate is nearly double the PricewaterhouseCoopers national estimate of 6.8%.[24] 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.

United explains that its trend factor breaks down into 4.1% unit cost, 5.5% utilization, and 1.0% trend leveraging.[25] This 5.5% utilization increase appears to be inconsistent with a 15.6% decrease in induced demand cited in the preceding paragraph of United's actuarial memorandum. The DFS should closely review intra-application discrepancies such as this. Further, United does not explain how each of the components in its trend factor is derived. The DFS should require that all carriers, including United, provide supporting exhibits to justify any such figures in their memos, so that the Department and consumers can verify their validity.

C. *Increased Morbidity and Population Changes*

United cites a 21.4% upward adjustment for increased risk in the individual market as compared with the small group market. This breaks down into a 15.6% adjustment for age/sex of the individual market and a 5% adjustment for increased morbidity. DFS should closely scrutinize this adjustment for three reasons.

First, United indicates that it used NY OHI Large Group filed age/sex factors to calculate the 15.6% adjustment, though it does not state how or why.[26] This could lead to an inflated age/sex factor if United is using large group data as a proxy for its small group data, as large group age/sex factors are likely to be lower than small group factors. Second, while United cites a 5% increase in morbidity, 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. Third, an age factor can be used to approximate increased morbidity for a population, as older populations tend to have higher morbidity than younger populations. Thus, use of both age/sex and morbidity factors may constitute double counting.

DFS should therefore review this calculation carefully to assess whether or not United is double-counting in applying upward adjustments both for age/sex and for morbidity. It should also be mindful of the fact that the initial pricing of the individual product for 2014 was already built upon many of these same distinctions between individual and small group rates. To apply

[24] Medical Cost Trend: Behind the Numbers 2015, PricewaterhouseCoopers, available at http://pwchealth.com/cgi-local/hregister.cgi/reg/pwc-hri-medical-cost-trend-2015.pdf, at 6.
[25] Actuarial Memorandum, at 7.
[26] Actuarial Memo, at 4.

these adjustments again in 2015 potentially exaggerates the pricing differences between the two markets over time.

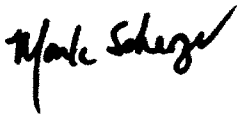
D. Provider Network Resizing

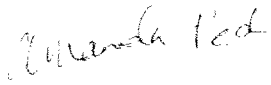
HCFANY urges DFS to carefully scrutinize United's rate application to determine if an adjustment was made to reflect its "resized" network. United is requesting approval of a decreased provider network of 15.7% over its Freedom Network.[27] Many carriers are using narrow networks for their Marketplace 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.[28] However, United's rate filings do not appear to accompany its reduction of network size with concurrent savings to its customers: notably, United makes no adjustment for network size on Line 14 of its Exhibit 18. The DFS should carefully review United's application to ensure that cost savings related to its network adjustment are distributed to its customers.

III. Conclusion

HCFANY urges the Department to closely review United'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

[27] Actuarial Memo, at 5.
[28] High-value Health Care Provider Networks. (July 1, 2014). Milliman, available at http://www.ahip.org/MillimanReportsPN2014/, at 1.

Community Service Society | Fighting Poverty Strengthening New York

105 East 22nd Street
New York, NY 10010

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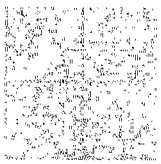

US POSTAGE
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Mr. Charles Lovejoy
Health Bureau
New York State Insurance Department
25 Beaver Street
New York, NY 10004

10004298599

[redacted]

6-18-14

UnitedHealthcare
Oxford

June 12, 2014

Re: United Health
Oxford Plan
Group Coverage

163LTSC30H1563501

[redacted]

[redacted]

To: NYS Dept. of Financial Services
Health Bureau - Premium Rate
1 State St.
NY, NY 10004

Re: Notice of Proposed Premium Rate Change
P PPO 20/30 F Non-Gated OHI, JJ9995

[redacted]

Please deny the increase. Over the past few years, my premium has increased OVER 30% with the COL only 2%. We cannot bear it. My prior plan was discontinued. We need help. Just say NO! I am literally begging for help.

Oxford Health Insurance, Inc. (OHI) is filing a request with the New York State Department of Financial Services (DFS) to approve a change to your group 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 Changes

The requested percentage change to your group's premium is shown in the attached exhibit. Please use the plan name listed above to reference the rate increase for your plan.

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

Why We Are Requesting a Rate Change

Rising medical expenses are the main reason for the requested increase. A number of factors contribute to these rising costs, including increases in the cost of medical services and increases in the amount of services used. We have prepared a narrative summary that provides a more detailed explanation of the reasons why we are seeking a premium rate adjustment. This summary will be posted both on our website and DFS's website for at least 30 days from the date of our rate filing. Our rate application will be posted on DFS's website and additional information will be available on companyprofiles.healthcare.gov.

30-day Comment Period

RECEIVED
JUN 23 2014
HEALTH BUREAU
N.Y.C. OFFICE

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.

RECEIVED
JUN 23 2014
HEALTH BUREAU
N.Y.C. OFFICE

June 18, 2014

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

Re: United Healthcare – Oxford

To Whom It May Concern:

We have received from United Healthcare a Notice of Proposed Premium Rate Change for our plan; the Annual Requested Increase is 11.4% to 11.5%.

We hereby object to this new increase. As a small employer providing all our employees with health benefits since our inception, we have seen health insurance costs skyrocket over the past six years. We are reaching a point where we will need to move to much less generous benefits.

We do not believe that the cumulative premium increases over the past years are actually justified by the insurers' ease, eternal reference to "rising medical expenses".

We believe that, in a competitive society, insurers must behave just like their customers, i.e. keep their service quality level while cutting their bureaucratic ways. Cost cutting rather than premium increase must be the priority of United Healthcare.

Finally, in an economy without inflation, we view an 11% increase request as simply ludicrous.

Thank you very much for your assistance.

Sincerely,

June 19, 2014

RECEIVED

JUN 23 2014

HEALTH BUREAU
N.Y.C. OFFICE

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

To whom it may concern,

I am writing today to voice concern and protest against the proposed rate increase from United Healthcare and Oxford on our healthcare plan [redacted] I am a small business owner and we provide our employees with Healthcare coverage. This is one of our greatest expenses as an employer. Healthcare costs are a financial burden for both our business and our employees. We cover 60% of this cost and our enrolled employees shoulder 40% of the cost. Last January 2014 there was an increase of 17% to our coverage. And now next year, they are proposing an additional 12% raise in coverage. This is ridiculous and hard to justify and for us to understand. I don't know any other business that would raise their rates by these large increases in consecutive years, and not improve their service. I strongly protest this rate increase and it is my hope and desire that New York state will refuse this increase.

Thank you for your consideration in this matter,

[redacted]

[redacted]

RECEIVED
JUN 23 2014
HEALTH BUREAU
N.Y.C. OFFICE

June 19, 2014

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

Re: Rate Increase Requested by United Health Care Oxford [redacted]

Dear DFS,

I am a subscriber to United Health Care Oxford's Health Insurance. I have been notified of ANOTHER rate increase requested by Oxford! It is becoming "Out of Control". I am paying $2300 plus a month for my family plan now. I think that is ridiculous. These insurance companies are always crying the blues and they are making plenty of money and they certainly don't need an increase every time they ask for one. I hope and pray that DFS doesn't just rubber stamp these rate increase requests!! It's time to put a cap on these premiums. At least slow the increases down a little. It's a very tough nut for me to handle when that $2300 dollars gets deducted from my paycheck on the first of the month and I go home with next to nothing that week!!!!! Please refuse them. I believe they just had a substantial increase last year. Thank you for the opportunity to say something about these absurd rates.

UnitedHealthcare

[redacted]

UnitedHealthcare
Oxford

June 13, 2014

TO NYS Dept of Financial Services

164LTSC32H0860201

We disagree with the rate increase and would hope N.Y. State STOP the increases!! The rates go-up and benefits down!

[redacted]

RECE[redacted]

JUN 26 2014

HEALTH BUREAU
N.Y.C. OFFICE

Re: Notice of Proposed Premium Rate Change

[redacted]

Oxford Health Insurance, Inc. (OHI) is filing a request with the New York State Department of Financi[redacted] 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 Changes – against!

The requested percentage change to your premium is shown in the attached exhibit. Please use the plan name listed above to reference the rate increase for your plan.

Please note that while we try to provide you with the most accurate information possible, the final rate 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 against!!

Rising medical expenses are the main reason for the requested increase. A number of factors contribute to these rising costs, including increases in the cost of medical services and increases in the amount of services used. We have prepared a narrative summary that provides a more detailed explanation of the reasons why we are seeking a premium rate adjustment. This summary will be posted both on our website and DFS's website for at least 30 days from the date of our rate filing. Our rate application will be posted on DFS's website and additional information will be available on companyprofiles.healthcare.gov.

30-day Comment Period They now cover less! AND WANT more money –

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.

UnitedHealthcare

[redacted]

UnitedHealthcare Oxford

TO: NYS Dept of Financial Services

June 13, 2014

This is terrible - the rates keep going-up and the benefits Down!!! They don't want to pay for much!

164LTSC32H3531101

[redacted]

Re: Notice of Proposed Premium Rate Change
G PPO 25/40 F Non-Gated OHI, AC36720

We disagree the rate Change!

Dear Jonathan Pigno:

Oxford Health Insurance, Inc. (OHI) is filing 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.

[redacted]

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

Proposed Premium Rate Changes — disagree - against

The requested percentage change to your premium is shown in the attached exhibit. Please use the plan name listed above to reference the rate increase for your plan.

Please note that while we try to provide you with the most accurate information possible, the final rate 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 — disagree against

Rising medical expenses are the main reason for the requested increase. A number of factors contribute to these rising costs, including increases in the cost of medical services and increases in the amount of services used. We have prepared a narrative summary that provides a more detailed explanation of the reasons why we are seeking a premium rate adjustment. This summary will be posted both on our website and DFS's website for at least 30 days from the date of our rate filing. Our rate application will be posted on DFS's website and additional information will be available on companyprofiles.healthcare.gov.

Insurance now Covers less & less!

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.

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

June 24, 2014

NYS Dept of Financial Services
Health Bureau- Premium Rate Adjustments

Dear Sir/Madam:

I am in utter shock with respect to the proposed 15%-20% rate increases proposed by United Healthcare with respect to the above policy.

I am a small businessman and I am literally paying the equivalent of a second mortgage for insurance coverage that requires significant co-pays every time I use it.

I am sick and tired of the Insurance Industry simply looking to choke the consumer to secure their own profit margins. Please deny this increase and have this insurer do what every other business does when expenses increase and please direct them to: **TRIM THEIR OWN FAT AND STOP PICKING AT THE CONSUMER'S BONES - THERE'S NOTHING LEFT ON MY END!!!!!!**

Please suggest to United Healthcare and all of these other insurers to stop with the multibillion dollar sales pitches with [redacted] Please suggest that their exorbitantly overcompensated executives take pay cuts. Please suggest that they get more efficient. Please suggest that its acceptable to take a loss while they adjust to the rigors Obama care. These insurers have enjoyed decades of choking the consumer and obtaining mind-boggling profits. Their present financial situation is called an adjustment.

Please don't place me and my family on a starvation diet to keep these insurance companies fat. When is the last time they rolled back their premiums during their decades of profit: **NEVER!** Thank you for looking out for the little guy. If these insurance companies continue with this insanity, the little guy will be no more.

Very truly yours,

UnitedHealthcare
48 Monroe Turnpike
Trumbull, CT 06611

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

June 23, 2014

To Whom It May Concern:
Re: Notice of Proposed Premium Rate Change [redacted]

We just received Oxford Health Plans (NY), Inc. (OHPNY) notice dated June 13, 2014 filing a request with the New York State Department of Financial Services to increase our premium rates for 2015.

We are writing to you to request that you hold/freeze our premium at our 2014 rate for 2015. You claim that rising medical expenses are the main reason for the requested increase. Running a small business as we do and have done for the past 20 odd years, we consistently have rising rent costs, rising office supply costs, rising transit costs, rising printing costs, rising mailing costs, rising unemployment costs, rising everything concerning running a business costs and yet, we have no one to write to and inform them that to cover these rising costs we are going to increase rates.

Due to this harsh, ongoing economic environment, we cannot increase our rates to our clients. In fact, we have not been able to increase our rates for years due to the fact that our clients are also forced to tighten their purse strings. It seems that the only ones able to increase their rates, year after year, are Insurance Companies, like UnitedHealthcare.

So while you are seeking a rate increase from the New York State Department of Financial Services, we are seeking a rate hold/freeze on our premium from UnitedHealthcare, holding our premium at the 2014 rate for 2015. Any rate increase would be a hardship for us. That's how difficult times are for us.

In a perfect world, while you seek to increase your rates on an annual basis like clockwork, every other business would also be increasing their rates so we would all be able to absorb and handle the increases. But the world is far from perfect and our business is far from being able to make ends meet on a regular basis.

So we implore you, UnitedHealthcare, to please refrain from raising our rates but rather freeze our premium at our 2014 rate for 2015.

By doing so, you will enable us to worry slightly less every month when bills come due.

[redacted]

[redacted]

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

June 18, 2014

To Whom It May Concern:

We are a small non-profit organization located in Rockland County NY. We enrolled in the New York State Small Business Healthcare Exchange because of the affordability of your plans. As a small business and a non-profit it was very costly to provide our few eligible employees with good health insurance. The Small Business Marketplace got us affordable and quality health insurance.

I received notice on June 12, 2014 that Oxford Health Insurance, Inc. (OHI) is filing a request with the New York State Department of Financial Services (DFS) to increase our group premium rate for 2015. The anticipated rate change is over +12%.

As a small public library and a non-profit organization increasing our premium by over 12% is debilitating not only for us but for our employees to pay. This rate hike would be crippling to us and our ability to provide our employees with affordable health insurance.

[redacted]

Please feel free to contact me if you need any additional information.

[redacted]

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

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

June 16, 2014

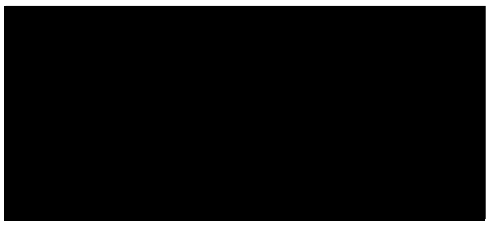
Re: Rate filing for Oxford New York small group HMO plans

To whom it may concern,

I am contacting you regarding the notice I received from United Healthcare about their Oxford Liberty product in which I am a current member. Last year they received a large increase and this year they are asking for a 15.7 % rate increase. I think it's outrageous that insurance companies are granted large increases every year in premiums when the cost of living is only 2%. The insurance companies claim they need large increases because of the monies spent on health. What I see is the upper management and CEOs making excessive salaries and benefit packages when we the consumers are paying more for fewer services. I am paying a higher premium this year and have fewer benefits with more deductibles and higher copayments.

My employer, which is a small business, cannot continue to absorb the increase in the premiums and has required me to contribute more into the plan. The copayment for specialists, like physical therapy, is higher than the actual payment they receive so therefore there really is no benefit. Yet I would still be required to get a referral from my primary care and my number of visits is limited through the management company. It just doesn't make any sense.

I strongly request you start putting a hold on the premium increases and don't allow them to get an increase higher than the cost of living. Wouldn't that be fair for everyone? We need to stop the madness!



6/17/2014

RECEIVED
JUN 19 2014
HEALTH BUREAU
N.Y.C. OFFICE

TO WHOM IT
MAY CONCERN

MY INSURER IS UNITED HEALTH CARE (OXFORD)
PLAN NAME IS GHNY-H.M.O. 25/40 L GATED O.H.P.
IT IS GROUP COVERAGE

I UNDERSTAND PRICES HAVE TO GO UP.
BUT ANY OTHER BUSINESS THAT RAISED THERE
PRICES 22% AT ONCE WOULD SHORTLY BE
OUT OF BUSINESS. I PLEASE URGE YOU
TO EXAMINE THIS REQUEST AND COME
TO A REASONABLE OR NO INCREASE. IT
IS A BURDEN TO PAY THE 522 A MONTH AS
IT IS.

[redacted]

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

NYS Department of Financial Services
Health Bureau – Premium Rate Adjustments

To whom it may Concern:

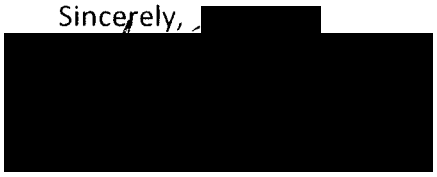
I am disputing the notice of a proposed premium rate charge increase for the upcoming year.

The letter I received stated that the main reason for the requested increase was because of the "rising medical expenses." But as it is, my annual insurance is very costly and should definitely be sufficient to cover all medical expenses, and then some.

As a long-time Oxford customer, I hope that you will not increase the already costly insurance, and that the NYS Department of Financial Services will hear me out and disapprove the requested rate change.

Thank you for your time and attention to this matter.

Sincerely,



June 19, 2014

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

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

To Whom It May Concern:

I am writing in regard to the proposed premium rate changes filed by United Healthcare Oxford.

I feel that a rate increase is entirely unjustified. As a result of the Affordable Health Care Act insurance companies had the opportunity to adjust their healthcare plans and in doing so they dramatically increased the premium rates. These new rates resulted in a 27.24% increase from the prior plan. Additionally, that 27.24% increase did not include an increase in benefits but rather it included an increase in co-payments in addition to an extremely high deductible which did not exist before.

The proposed adjustment is actually a significant increase in the rates- over 15% per quarter.

It is entirely inequitable for United Healthcare Oxford, to expect the consumer to pay an additional increase in rates after increasing their rates so dramatically in 2014. How does United Healthcare Oxford expect average American citizens to be able to afford paying thousands of dollars per month?

As it stands the Affordable Health Care Act has made insurance more expensive and has given the consumer less insurance coverage than in the past. The new proposed rates are prohibitively expensive. I ask that the proposed change be denied.

Sincerely,

[redacted]

Insurer: United Health Care Oxford
Plan Name: G HMO 30/60 L Gated OHP
Group Coverage

6/22/2014
Re: Attached copy
of Notice

[redacted]

Bohemia, N.Y. 11716

To whom This May Concern,
Please Be advised, I do not have access to a computer. Therefore, please send me the documents all please to fully review. Before I make any selections.

The way I understand it. You want an increase of money from Orbits employees. I'm one of them, but yet at a meeting held in our Company. We weren't going to see an increase. But Now we are. It sounds like a ~~polit~~ political promise at the time of the meeting. Now its months later, but through Red tape it has to be broken. How convienent. Just please send me all the information that you have on the website, on paper so I can review it. I prefer a hard copy to reference. And I do not have internet access.

Thank You.

TM

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

June 26, 2014

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

RE: Rate increase request from United Healthcare Oxford dated June 12, 2014
Plan – B EPO HAS $3500 40/75 L non-gated OHI – GROUP

Dear Financial Services Staff,

The insurance company rate increase request is out of line at 9.4%. It should not be granted and should be closer to 0%. My group has been with United Health for five years, since the ACA has been planned and approved. Insurance rates were promised to be lower. Each year the company has been granted a min of 10% increases. My previous HMO gated with only co-pays of 30 / 50 started at $780 monthly and ended in May 2014 at $ 1,580 monthly. That's close to a 100% increase during that period of time. What we were offered was a gold level plan at $1,848 monthly. That was a potential 15% increase plus a maximum of $8000 out of pocket. Or a potential $ 2,514 monthly!

Now with the new ACA metal plans in effect our selected plan is a Bronze level as stated above. The monthly rate has decreased to $ 1,380 monthly; HOWEVER, this plan has a maximum out of pocket at $12,700 a year. That's $1,058 more a month to the insurance company if the policy limits are reached during the contact year to cover they're cost of risk. That's $ 2,438 a month or a 64% increase in one year for the same basic medical cost risk being born by United Healthcare. Its time that these rate increases be lowered as promised as part of getting the ACA law enacted.

I therefore strongly request that as my state elected or appointed guardians that you act true to the intent of the ACA and either hold or even lower rates for consumers in NYS.

I thank you for your help.

Sincerely,

June 26, 2014

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

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

Re: Oxford Health Insurance, Inc.
Name of Insurer: United Healthcare/Oxford
Name of Plan: Freedom Network Group Coverage
Plan Name: P PPO 20/30 F Non-Gated OHI

Dear Sir/Madam:

I am in receipt of a Notice of Proposed Premium Rate Change by United Healthcare dated June 13, 2014. I am writing to voice my strong opposition to the requested rate changes. As a small business owner providing health insurance for 16 employees, the cost of health insurance is already onerous at the current rates. The tremendous increase in rates requested by United Healthcare (between 11% and 12% for the first two quarters of 2015 – essentially a 23% annual increase) would be a significant hardship to my business and will certainly affect our hiring decisions in the future.

As the consolidation of health insurance companies has reduced the local marketplace to essentially one carrier, it is creating a monopoly situation of price fixing that is extremely detrimental to consumers and business owners. I therefore respectfully ask that United Healthcare's request for proposed premium rate changes be denied in full.

Very truly yours,

[redacted]

June 26, 2014

RECEIVED
JUN 30 2014
HEALTH BUREAU
OFFICE

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

To whom it may concern:

This letter is to complain about the change to increase our company's insurance plan for the upcoming year.

We received a letter of notice which stated that the main reason for the requested increase was because of the "rising medical expenses." At present, our company's annual insurance is very costly and should definitely be sufficient to cover all our medical expenses, and then some.

As a long-time Oxford customer, we have been paying high premiums for many years that have been going up yearly. As it is, our insurance is very expensive, and we were disappointed to see that Oxford Health Insurance wants to raise our already costly insurance plan yet again.

We really hope that the NYS Department of Financial Services will pay attention to this letter and disapprove the proposed premium rate increase.

Thank you for your time and attention to this important matter.

Sincerely,

[redacted]

premium rate change request
[redacted] to: premiumrateincreases 06/16/2014 12:11 PM

Dear Sir/Madam,

I am a small business employer. I provide health benefits to my full-time personnel. In December we were notified by our then current health insurance provider that all of our plans would be cancelled due to the implementation of the Affordable Care Act. We shopped around for new coverage and ended up settling with a plan that offered **less than we had before at 30% more money.** Now, I am being notified by our current healthcare insurance provider that **my current premium may go up another 11.3% if you approve the rate change increase** they are requesting. I am writing in hopes that you will not approve another rate increase to my healthcare premiums. I cannot absorb any more rising costs of health insurance.

The details are:
Our insurer is: United Healthcare - Oxford.
Plan name is G EPO 20/40 L Non-Gated OHI

Thank you.

Sincerely yours,
[redacted]
P.O.Box [redacted]
Southold, NY 11971

Proposed rate changes /Oxford

[redacted] to: premiumrateincreases 06/16/2014 02:01 PM

OH. MY. GOD.

Are you serious????? Oxford didn't just renew my health care plan this year. They cancelled my old one and slotted me into a new one which is, of course, 20% more expensive and covers less, namely the B EPO HSA $5,000 L Non-Gated OHI. BULLSHIT.

This can't be the same country I have lived in my whole life!!! My health care costs, BEFORE I SNEEZE OR GO TO THE DOCTOR FOR ANYTHING, are a full ONE FIFTH of my income.

THIS WHOLE HEALTHCARE SYSTEM IS A SCAM!! I AM SICK OF IT. BUT I CAN'T AFFORD TO BE SICK. ONLY THE POOR AND THE SUPER RICH CAN AFFORD TO BE SICK IN AMERICA.

NONONONONONONONONO to a premium rate increase.

[redacted]

Prior Approval Submission
NYS Department of Financial Services
To: PremiumRateIncreases

06/16/2014 03:03 PM

Empire HealthChoice Assurance, Inc
group
hmo
[redacted]

Hi, our Insurance Company is Oxford Health Plans Inc. This is not an option under "Select the Insurance Company Name" on your submit a comment page. I received multiple letters from OHPNY regarding a proposed premium rate change for a few of my group plans. I understand that medical expenses have increased due to the Healthcare Act. But the percentage proposed for the Gold HMO 30/60 L Gated OHP Plan seems a little steep. When making these proposals, are insurance companies provided with a limit on how much of an increase they can propose? Are they given a minimum amount? Is the rate of 15.6% they have proposed for this particular plan, the minimum amount that they can propose? The premium for this plan has already gone up 14.8% due to the Healthcare Act. Not only did the premium go up, but coverage went DOWN. Not only are my employees paying more money, but they are getting screwed over as far as their coverage goes. We are a staffing agency for Legal Institutions, primarily Law Firms. How can we possibly staff projects for our clients if we have health insurance costing up to $731 a month? Any potential candidates may turn down job opportunities with us because the health insurance is unaffordable. In turn, business will go down for us. Less and less projects will go un-staffed. Benefits are a great selling point when recruiting for open positions, which makes sense. Providing affordable health insurance for our employees will only increase morale, therefore creating a happy workplace. Without affordable health insurance, how can we keep our employees healthy and working? Is this rate increase proposal being considered immediately after submittal? Very unsure how this proposal process works. Once it is assessed, can DFS change the rate as they see fit? If this rate is approved, this plan will have increased by 30.2% since January of 2014. That is a large increase, how does this not violate any HIPAA Laws? Does this even apply to HIPAA? So many questions are going through my mind. My number one question regarding this rate increase proposal is this: Is this truly "lawful?" I already know this is highly unfair, but I am unsure if this violates any healthcare laws. I am hoping DFS does their job correctly and makes sure this rate increase is lawful. I would feel more at ease if coverage went UP with this rate increase, and I wouldn't be so harsh on this proposal. My last question to you is, are your employees at DFS currently happy with their health insurance provided through you? I would hope you provide affordable health insurance to your employees. If not, I expect this "comment" to go unanswered due to your disconcerted employees not giving a damn about their job because their employer does not give a damn about them.

Rate increases

tlobue to: premiumrateincreases 06/16/2014 04:23 PM

Cc: [redacted]

[redacted]

Ins. Provider-United Healthcare Oxford
Name of Plan-Oxford Health Insurance Inc.-Small Group Off Exchange
This is Group Coverage
Plan name- S PPO HSA $2000 30/60 F Non-Gated OHI

The rate changes proposed for 2015 are simply unacceptable. Insurance companies come in every year and propose ridiculous increases, and hard working people have to get charged a higher premium for insurance every year. The amounts proposed are always in the double digits, but yet I would like to see how many working class people have double digit increases in their pay every year. I think these insurance companies need to be told that increases of this size are unacceptable, unaffordable, and will not be tolerated.

Thank you for your time,

[redacted]

Rate increase

[redacted] to: premiumrateincreases 06/16/2014 04:43 PM

Cc: [redacted]

I attach our letter objecting to the proposed UnitedHealthcare insurance rate increase

[redacted], Executive Director

[redacted] New York, NY 10024

Tel: [redacted]

Web: www.wscah.org | Like us on Facebook | Follow us on Twitter

Response to proposed increase by United Healthcare.pdf

June 16, 2014

New York State Department of Financial Services
Health Bureau-Premium Rare of Adjustments
1 State Street
New York, NY 10004

Insurer: UnitedHealthcare Oxford
Plan: Platinum Group Coverage
Plan Name: P Standard EPO 15/35 Gated OHI

Dear Commissioner:

We strongly object to the proposed rate increase from Oxford Health Insurance equal to 24.9% cumulatively at 12.4% in Q1 and 12.5% in Q2. We believe that the insurance company is proposing an exorbitant rise so that even if you cut back what is proposed—the rate increase will still be unaffordable. I am not aware of any business that can claim the need to raise costs by such percentages—except a business that thinks its customers will be unable to turn to another provider. I also find it offensive that an insurer can change the price of coverage after only six months—rather than being obliged to offer a one-year contract.

[redacted] is an emergency food pantry and counseling service with less than 20 employees. Because the employees of our nonprofit organization do not earn high salaries, we attempt to provide them with good benefits. The insurance offered under the ACA is already significantly less good than they were receiving previously in the open market through Emblem Health (though no one seems to want to believe this). Now we are being asked to pay even more for this coverage. This might force us to further reduce the quality of coverage in order to afford an increase.

New York State should not permit this increase.

Sincerely,

[redacted]

[redacted]
Executive Director

[redacted]

Stop The Insanity
[redacted] to: premiumrateincreases 06/16/2014 05:59 PM

United Healthcare Oxford
Freedom PPO
Group
P PPO 10/20 F Non-Gated OHI

Dear DFS,

No! Say no! Vote NO!

These annual rate increases are literally killing our business. Medical expenses have not risen by 11+% each and every year for ten years in a row, and using that trite and unsubstantiated excuse is embarrasing. Nothing has risen that much. The cost of food, cars, housing, even gas hasn't risen like that. Stop the insanity. Do not let the insurers have this increase. We can't raise the prices of our goods and services by that amount each year, and if everyone did, the economy would inflate and collapse.

Is no one watching? Does it take a situation like the VA in Arizona to find that there is something terribly wrong? Are these rates regulated or not? If small business is the engine of growth in America and you, the Department of Financial Services are monitoring health insurance rates on behalf of the citizenry, how can you not act in the public good and control these usurious increases?

[redacted]
CEO
[redacted]
White Plains, NY 10603
[redacted]

PREMIUM RATE ADJUSTMENTS

[redacted] to: premiumrateincreases 06/17/2014 06:34 AM

To Whom It Concerns,
I am with Oxford Liberty and I have group coverage via a small business under G EPO 15/25 L Non-Gated OHI.
I got a letter telling me that I can submit comments to DFS.
My comment is:
No. No. No. Please no. Don't allow such increases in 2015. I work in the publishing industry and our business is dwindling. My employer hasn't given us raises or bonuses in 2 years. Yet, health insurance costs keep rising. The employer has capped the amount they contribute to insurance so each increase in rate ends up being a decrease in my salary and I simply cannot afford this.
Insurers and Health Care Professionals call themselves "Providers". Not so. I am the Provider for my family and it gets more difficult each year. If the government allows them to increase, then it just facilitates the problem. These folks need to understand the burden. Insurance is supposed to mean that I don't fear huge out of pocket expenses - because I have bet against myself and paid every month while I am healthy to insure that when I am ill I will have support from them. I don't have a savings right now. I am unable to afford to buy a house and I don't know how I will send my kids to college. I know these are not life-threatening concerns. However- I shouldn't additionally be concerned that I or my family may get ill and have expenses we cannot cover. We are, after all, INSURED. At great expense...but I AM concerned. I wouldn't DARE go outside of network. And these plans call themselves Liberty and Freedom - but they limit the choices I have for care and limit my freedom to select how things are treated. I understand some of that is necessary -but those limits should mean that they don't have to impose huge increases. 11% is simply too much for those of us who are not in the 1%.
Please do anything you can to address this. Enabling the cycle just hurts individuals.
Thank you for your time. I know you have a big job to do. Your job is to help 'we the people' - the real 'providers', however. Not the businesses who have allowed thing to escalate out of control and who deal in monopoly-money pricing that makes no sense in reality.

[redacted]

United Oxford rate incresaes

[redacted] to: premiumrateincreases@dfs.ny.gov 06/17/2014 08:05 AM

Please respond to [redacted]

I am responding about the notice of proposed premium rate change request for G HMO 3/60 L Gated OHP Group # MC27510. I currently have this policy and am against any rate increases. I am a also a health care provider for chiropractic services and am on their panel. The current reimbursement rates for chiropractic care have not risen in over a decade and in most cases have even been reduced. The co-payments in many cases exceed the allowable rate for chiropractic, leaving the patient to pay the entire amount of service. This does not warrant an increase in premium because of the reimbursement policy in many cases is $0 and is not adding to their expenses.

[redacted]

United Health Care's request for increasing premiums

[redacted] to: premiumrateincreases 06/17/2014 08:57 AM

RE:
Oxford (United Healthcare
Group Coverage
S EPO 40/70 F Non-Gated OHI

To Whom it may concern,

I am writing, AGAIN, in request that you **DO NOT** allow a rate increase for UnitedHealthcare / Oxford products; especially the small group EPO plans.

I have been in practice for 11 years in NY as a single practitioner with very few choices for health insurance and very costly choices to cover my family's health needs - now at $20,000/ year for BASIC ins.

Being a healthcare professional and accepting insurance fees for services, I am well aware of the following formula: I have **NOT** gotten a single raise (increase in reimbursement) during the past 11 years.. **In fact, pay cuts**. As a small business group, my health insurance rates for my family plan have **risen by >50%, deductibles (now family AND individual under same plan) and hospital copays have increased by >50%**, and services / coverage have decreased (the amount of visits covered, medication, etc).

Therefore, if I am not receiving the benefit as the consumer (services/ reduced cost) and I am not receiving it as a physician (reimbursement), then this great gap is **ONLY** going one place; THE INSURANCE COMPANIES.

With multi-million / billion dollar quarterly profits, how can we keep allowing the insurance industry to take increases at the expense of the American people?

PLEASE UNANIMOUSLY TURN DOWN ANY PROPOSALS FOR THE INSURANCE INDUSTRY TO INCREASE IT'S RATES!

Thank you for taking this letter into consideration.

Kind Regards,

[redacted]

This communication and any files transmitted with it may contain information that is confidential, privileged and exempt from disclosure under applicable law. It is intended solely for the use of the individual or entity to which it is addressed. If you are not the intended recipient, you are hereby notified that any use, dissemination or copying of this communication is strictly prohibited. If you have received this communication in error, please notify the sender. Thank you for your cooperation.

Prior Approval Submission
NYS Department of Financial Services
To: PremiumRateIncreases

06/17/2014 09:15 AM

Mutual of Omaha Insurance Company
group
hmo
[redacted]
I disagree with the rate premium increase for 2015. I am barely surviving to make ends meet at my job and Oxford receives an easy rate increase, that is unnaceptable! Co payments are already through the roof and everyone is struggling in this economy, I DISAGREE WITH ANY INCREASES FOR 2015, ANY INCREASES FROM OXFORD HEALTH PLANS INC SHOULD NOT BE SUBJECT TO ANY INCREASES UNTIL 2016!!!!!!

Re: Oxford Health Insurance rate increase request for 2015

[redacted] to: premiumrateincreases 06/17/2014 09:45 AM

Re: Insurer: Oxford Health Insurance, Inc.
Plan: P EPO 20/30 F Non-Gated OHI
Type: Group Coverage, PP21977

To say the least, I am shocked that Oxford is seeking yet another rate increase for health insurance after increasing my premium from $587.73 in 2013 to **$836.12** in 2014 (a 42.5% increase) for basically the same coverage. Now they are seeking an additional 11.3% and 11.4% to offset the cost of covering dependents age 26 and 29.

I was perfectly satisfied with the plan and coverage that I had in 2013; there was no need for that plan to be eliminated and replaced with a more expensive one. I have no dependents on my health insurance, but now I am forced to pay for the dependents of others. It is wrong to force people to pay for healthcare that they do not use nor need. Moreover, wasn't the Affordable Care Act supposed to lower the cost of health insurance, or did I miss something in that whole debate? Where are the health insurance subsidies that the federal government promised to help small businesses like mine afford these enormous premium increases?

The NYS government needs to wake up to the fact that businesses are leaving this state because of the enormous taxes and insurance costs it requires businesses to pay. If the DFS allows Oxford to increase its health insurance rates yet again, it will be one more nail in the coffin of my business in this state for sure.

Needless to say, I urge you not to approve Oxford's request for yet another rate increase.

Sincerely,

[redacted]

Prior Approval Submission
NYS Department of Financial Services
To: PremiumRateIncreases

06/17/2014 11:19 AM

Empire HealthChoice Assurance, Inc
group
other
[redacted]
To whom it may concern , I agree with Oxford Health Insurance ,Inc. for their request with the New York State Department of Financial Service to aprove a change to our premium rates for 2015 . Because of rising medical expenses , that is the main reason for the requested increase. We are looking forward to get a fair approval for our premium rates for 2015 . Thank you
Sincerely , [redacted] June 17/ 2014

(no subject)

[redacted] to: premiumrateincreases 06/17/2014 11:20 AM

This comment is regarding the requested rate increase by Oxford Health plans. My group plan is P PPO 10/20 F Non-Gated OH.
I love Oxford, it is a great carrier but how much profit is enough? I oppose the rate increase as requested and recommend a more modest one.

Oxford rate increases

[redacted] premiumrateincreases 06/17/2014 12:50 PM

Hello,

To my surprise, I received the attached letter in the mail yesterday.

Insurance Name: **UnitedHealthcare Oxford**
Name of Plan: **Liberty Plan (SM) Gated EPO**
Cover Type: **Group VL2315**
Plan Name: **S Standard EPO 30/50 L Gated OHI**

I have two comments.

1. As a small business of 4 people, this increases our health insurance costs ~11%, taking approximately $327.63/month out of an extremely tight budget. If this goes through, we may not be able to add our newest FTE to our plan *or* ask our employees to foot a great portion of the tab.

2. According to the Insurance Journal, "In 2014, however, average health care premium increases are projected to move back to the 6 percent to 7 percent range." Even better, "New York City (at 1.6 percent) experienced lower-than-average rate increases in 2013".

Why are our rates rising ~11%?

Smells a little like bait-and-switch: price low on the exchange, then raise rates after folks sign up.

Thank you for your attention in this matter. Our experience on the NYS exchange was excellent all around. Keep up the good work.

ai

[redacted]

Oxford-increase.pdf

Oxford Looking for a rate increase

[redacted] to: premiumrateincreases 06/17/2014 01:18 PM

To Whom it may concern,

Oxford
Liberty
Group
G HMO 30/60 L Gated OHPDepAge29

Oxford requesting another rate increase???
Why don't they just take the money from all these mailings and apply them as credits to our accounts.
The money spent on Postal and Paper and labor for these mailings would probably cover the increase on all the customers that got their Co-Pay increased last quarter
We are a small business and increases like these keep us from hiring new employees
If rates keep increasing they will exceed the minimum wage
Please help us grow are business and the economy
This is not what the majority voted for in the last 2 elections
Solve the problem and say no to the insurance companies and audit there business as you did GM

[redacted]

Oxford Insurance Rate Increase

[redacted] to: premiumrateincreases@dfs.ny.gov 06/17/2014 01:33 PM

DFS,
I am the owner of a small business and just received a notice that my insurance premiums are to be increased over 12% next year in 2015. I am not understanding what necessitated this increase and I cannot find the answer on either (DFS or Oxford's) website. It was my understanding that the Affordable Health Care Act would decrease the cost of health insurance for individuals and business owners. As a small business owner I want to provide the best coverage for my staff but I can no longer absorb these continues rate increases. I strongly recommend that you disapprove the requested rate increase.
Thank you for your time.
Kindest regards,

[redacted]

Proposed rate change - Oxford Health

[redacted] to: premiumrateincreases 06/17/2014 04:26 PM

Cc: [redacted]

To whom it may concern:

I was provided with a letter by Oxford Health indicating a proposed rate increase for 2015. The range of increase is 15-22%. This is outrageous, especially since the increase for 2014 was large and significant enough. There is nothing affordable about the Affordable Care Act.

I am sure that the executives of Oxford Health are not sharing with this burden. I highly doubt that they compromise their pay and company profit in order to provide quality care at reasonable prices. This is disgusting.

I urge you, NYS Department of Financial Service/Health Bureau, to deny this increase.

Name of my insurer is United Healthcare Oxford
Name of the plan is Health Pass NY, Oxford HMO Gold
Small business group coverage
Plan name Oxford HMO Gold Liberty

--

Thank you and kind regards,

[redacted]
(lower level)
New York, NY 10016
[redacted]

Oxford health Insurance
[redacted] to: premiumrateincreases@dfs.ny.gov 06/17/2014 06:12 PM

Re: small Group off exchange

I just received notice of a proposed premium rate increase on my
G PPO 25/40 F Non Gated OHI plan
I TOTALLY OPPOSE this increase and feel completely victimized
As it is, I recently received a notice that they may or may not cover my children's ADHD medicine and if they do, they will likely increase the copay.
They already have ALL extended release ADHD meds in the top tier of co pays which for me is $75!
It seems as though this is singling out a group and it's rather discriminatory.
Another game they play is that when they reject a claim with coding issues, they provide a vague explanation so it may take several attempts to submit it correctly - this buying them more time to pay and or hoping consumer just gives up!
They are legalized crooks- taking advantage of their customers.
This RATE INCREASE IS NOT FAIR
I would like to know where to file complaints against Oxford

[redacted]

Sent from my iPhone

G HNY HMO 25/40 L Gated OHP, TB8492.

[redacted] to: premiumrateincreases 06/18/2014 09:25 AM

My name is [redacted] you may know me as G HNY HMO 25/40 L Gated OHP, TB8492. I have one employee participating
in this Oxford health plan. I have to say with it's terribly high deductible for my employee and every year this plan has gone up $100 PER MONTH, again
another increase for 2015? When is this going to stop? 22% percent increases on higher premium numbers each year. How is this legal, seems like a joke to me.
This is why people leave NY state. I'm very frustrated can someone please explain why and when this is going to stop? thank you, [redacted]

rate increase protest

[redacted] to: premiumrateincreases 06/18/2014 10:04 AM

please see the attached letter - thank you ZCG Letter.pdf

June 18, 2014

NYS Department of Financial Services
Health Bureau – Premium Rate Adjustments
1 State Street
New York, NY 10004
By email: PremiumRateIncreases@dfs.ny.gov

RE: Notice of Proposed Premium Rate Change
G PPO HAS $1500 F Non-Gated OHI, ZC1127
United Healthcare/Oxford

To Whom It May Concern:

We are a small business of 13 persons. On the whole we are a very healthy group of people. Several years ago we changed our medical benefits process so that we are all now using Health Savings Accounts [HSA]. These plans already carry a high deductible, to ensure that we think hard about our medical spending. We always saw the benefit to this system in that we are incentivized to use medical benefits efficiently because what health dollars we don't spend in our HSA accounts can be saved and used for future medical expenses.

United Health, the owner of Oxford Health Insurance, including the Oxford small groups, continues to be highly profitable. The company recently announced what is becoming an annual 34% increase in its dividend payout. It also renewed its share buy-back program of up for a total of $8 billion [$ billion over last year's program]. United Health is clearly flush with liquid assets and a robust market share.

We do not believe that United Healthcare/Oxford has made a case to increase our medical premiums by 12.3% for renewal dates April 2013-June 2014, an increase of some 1000% over inflation [assuming current inflation at about an annual 1% rate]. We do not believe this kind of increase is warranted or can be justified. United Healthcare/Oxford, as a large insurance company, has the muscle to contain medical costs. We as individuals or even as a small group do not, except through United Healthcare. In us, they have ideal clients in that we are all doing a lot to take care of ourselves and not overuse medical services

We believe that large insurance companies are denying us the better premiums charged to large groups. We do not believe this is fair. We ask that you stringently review United Healthcare/Oxford's proposed 12.3% medical premium increase for real, justifiable claims for such an increase. Thank you for your help.

Managing Director

Comments on UnitedHealthcare Oxford rate increase

[redacted] to: premiumrateincreases 06/18/2014 10:17 AM

Before you approve the UnitedHealthcare Oxford proposed rate increases, please look at their current premium and past premiums. They keep racking up their rate consecutively each year for past years, healthcare has become more and more unaffordable and forcing us to make choice to switch to insurer who does not have all the physicians that my family members go. The only advantage they have is that they have much more physicians associated with them. Why can't legislation makes it so that doctors be required to affiliate with more insurance carriers, so that insurers would be having a better and more healthier competition platform?! Isn't that the purpose that the president want to make healthcare more affordable and acceptable?
Thanks for your understanding!

[redacted]

Insurer: UnitedHealthcare Oxford/ Oxford Health Insurance Inc.
Plan Name: P EPO 20/30 F Non-Gated OHI
Group coverage

United Healthcare proposed rate change

[redacted] to: premiumrateincreases 06/18/2014 11:39 AM

Dear Sirs,
I am writing in response to a letter received yesterday from United Healthcare Oxford re: notice of proposed premium rate change.My plan name is P Standard PPO 15/35 L Gated OHI. We have group coverage. The policies were bought through the New York State Of Health website. (small business)

Before the changes brought on "Obama Care", we had our company's health insurance with another insurer. It was very good insurance (PPO) with reasonably high premiums and no referrals. We were dropped on 12/31/13. So much for "if you like your insurance, you can keep your insurance".

We were shocked to find the new insurance with United Healthcare Oxford (also a PPO), which was touted by state and federal officials as being more reasonably priced, was actually costing $400.00 more and providing less and now required referrals to all but our primary.

Now United Healthcare Oxford has asked for a 12.4% increase 1Q and 12.5% 2Q. Really??? Exactly what part of that is reasonable or affordable?

Please carefully consider this situation. The insurance companies have been crushing small businesses here in New York for years.
Why are the people who scrounge to pay health insurance premiums continually penalized by ever increasing premiums, to pay for those who at this point are choosing not to be insured? Their choice should falling on them and their health care provider, not on the premium payers who are playing by the rules.

Please do something to change this trend once and for all.

our time.
[redacted]

Protest rate increase for OHI /UnitedHealthcare 2015

[redacted] to: premiumrateincreases 06/19/2014 11:26 AM

Cc: [redacted]

To whom it may concern,

I am writing today to voice concern and protest against the proposed rate increase from UnitedHealthcare and Oxford on our healthcare plan (P EPO 20/30 F Non-Gated OHI). I am a small business owner and we provide our employees with Healthcare coverage. This is one of our greatest expenses as an employer. Healthcare costs are a financial burden for both our business and our employees. We cover 60% of this cost and our enrolled employees shoulder 40% of the cost. Last January 2014 there was an increase of 17% to our coverage. And now next year, they are proposing an additional 12% raise in coverage. This is ridiculous and hard to justify and for us to understand. I don't know any other business that would raise their rates by these large increases in consecutive years, and not improve their service. I strongly protest this rate increase and it is my hope and desire that New York state will refuse this increase.

Thank you for your consideration in this matter,

[redacted]

FW: rate increase

[redacted] to: premiumrateincreases@dfs.ny.gov 06/19/2014 12:03 PM

To Whom It May Concern:
I can't help but think that writing to you to voice my sincere displeasure and disgust at the thought of a potential rate increase is a waste of time but at least you will know how I feel.
I am currently with Oxford on a G EPO $50 F Non-Gated OHI, my group is LT 1029. Year after year I have been subjected to big increases. Sometimes I've paid them, sometimes I have had to cut out services like prescription drug coverage to keep my plan affordable. The biggest increase has been this past May, $140.00 per month plus the addition of a $4000 deductible amongst other things. I am paying $718.00 per month for myself which is ludicrous! Now they want to increase the premiums 11.3%....when is this going to stop? I will probably drop insurance coverage next year if this is approved as I'm barely holding on. The state of affairs with the medical industry is a disgrace. I have looked into the exchanges and the premiums aren't much better and most of the doctors do not take those plans so what good are they. I hope my feelings and those of others will be taken into consideration.
Sincerely,

[redacted]

More Information on Proposed Rate Change

[redacted] to: premiumrateincreases 06/19/2014 01:05 PM

Good afternoon,

I am seeking more information on the proposed rate change for United Healthcare, group coverage plan P PPO 20/30 F Non-Gated OHI. I would like to know what exactly changes. Looking at the attached exhibit, I see Dep Age 26 and Dep Age 29. What does that stand for? And is Q1 and Q2 for quarters? Any answers to the questions provided and further information detailing the premium increase will be greatly appreciated.

Best,

[redacted]

Proposed rate increase

[redacted] to: premiumrateincreases 06/19/2014 05:01 PM

Dear Sir or Madam,

I am writing in response to a letter dated June 13, 2014, sent by United Healthcare/Oxford to me; I am enrolled in Oxford Health Plans through the Small Group Plan of my employer, P PPO 10/20 F Non-Gated OHI.

The letter explains that Oxford is filing a rate application with the New York State Insurance Department. If the rate increase is approved, the cost of healthcare will increase 11.3% as of January 2015.

This percent rise far outstrips inflation. Moreover, the website explanation states that medical expenses are rising at this rate, but does not offer compelling evidence.

Please confirm receipt of this email and make note of this Oxford member's concern about and disagreement with the proposed rate increase.

Sincerely,

[redacted]

Prior Approval Submission
NYS Department of Financial Services
To: PremiumRateIncreases

06/19/2014 05:46 PM

Oxford Health Insurance, Inc.
group
ppo
[redacted]
We received a letter proposing that our rate increase more than 12%. To me, this is outrageous, especially given the sharp increases in all the previous years of the economic downturn. Aside from the stock market, the economy is still in the gutter. We could not offer or receive any wage increases this year. There are more empty storefronts in our business's neighborhood. There has been no recovery for most people and there has been very little inflation--except for our bills! DO NOT ALLOW ANY RATE INCREASES until the economy rebounds for the rest of us.

Oxford Health Plan Rate Increase Request

[redacted] to: premiumrateincreases 06/19/2014 06:01 PM

Dear DFS,

Please keep doing your job as you oversee the insane health insurance rate requests made by Oxford.

The continued increase of healthcare premiums is killing small businesses, literally & figuratively. Each year as premiums increase far faster than we can keep up with we reduce our coverage and increase our out of pocket costs. This scenario has left me with significantly less coverage at a much greater cost than I had 10, 15, 20+ years ago.

Please put a stop to these increases!!

[redacted]

We have both Oxford Freedom & Liberty Group Coverage here at my business.

My particular plan name is G HMO 30/60 L Gated OHP

[redacted]

Premium rate increases

[redacted] to: premiumrateincreases 06/19/2014 07:29 PM

To Whom It May Concern:

I am a subscriber of Oxford Health Insurance, Inc., Policy G EPO $50 F Non-Gated OHI, TM 12409 as of January 2014.

I would like to express my concern on a premium increase to the already high premiums and out of pocket expense. It is mandatory to have health care, however the cost for the consumer is extremely high. I would appreciate it if the NYS Department of Financial Services take into account that salaries are not being raised to meet the demand of higher cost of living.

Sincerely,

[redacted]

Prior Approval Submission
NYS Department of Financial Services
To: PremiumRateIncreases

06/19/2014 07:30 PM

Oxford Health Insurance, Inc.
group
healthyny
[redacted]
Hi, I am in the "G HNY HMO 25/40 L Gated OHP" group. i received a notice of a proposed increase in to my premium of 22.0% in Q1 and 22.1% in Q2. i do not qualify for medicade, but i am barley affording my health insurance now. the proposed change will make insurance unaffordable for me, all it would is force me to cancel my coverage and pay the fine. if somethings goes wrong with me i will just turn up to the emergency room. is this the AFFORDABLE care act in action?!!?

Prior Approval Submission
NYS Department of Financial Services
To: PremiumRateIncreases

06/19/2014 11:52 PM

UnitedHealthcare Insurance Company of New York
group
epo
[redacted]
Hello, We received another letter from United Health Care Oxford that there will be another increase of premium to the health Insurance. A couple's Insurance already stands on $1,236.36, with the increase Oxford is asking there will be another $150 added to that. This will make the total $1,386 per month! At what point can we say that this cost is ridiculous? Please prevent Oxford from hiking up their rates yet again. Their poor excuse of "increased medical costs" is nothing more than a fraud. These are human lives we're talking about. It is a yearly expense of $16,632. Please put an end to this. Thank you.

Proposed tae change

[redacted] to: premiumrateincreases@dfs.ny.gov 06/20/2014 10:16 AM

To the NYS Dept of Financial Services-Health Bureau-Premium Rate Adjustments

From: [redacted]
United HealthCare Oxford
HMO 30/60 L Gated OHP
GROUP-P03824

I am writing to state that the proposed rate increases to this plan is not acceptable. These rates have already been increased last year and they are becoming unaffordable! I am writing on behalf of myself and our group, and asking that the rates that are high enough are NOT increased in any way for the 2015 year.

Thank you for your time.

Sincerely,

[redacted]

Prior Approval Submission
NYS Department of Financial Services
To: PremiumRateIncreases

06/20/2014 10:49 AM

Oxford Health Plans (NY), Inc.
group
epo
[redacted]
Oxford's rate increase violates Department guidelines and actuarial standards because: - for-profit Oxford has its primary obligation to shareholders who demand profit so their rise is about profit not service, financial health, utilization rates, etc. - Oxford's financial health is fine, no matter how their tons of highly-paid lawyers and accounting consultants couch their language in their filings & documents - a high utilization rate for pricey schemes is due to their not fighting claims with the providers - employer contributions to employee's premiums have no effect because someone, employer or employee, must pay the premium - Oxford isn't about the lowest rates possible while keep financial health, it's about profit to its shareholders - rates charged are likely far more than adequate to pay claims - they've plenty of other corporate opportunities to maximize profit instead of raising rates on consumers; lobbying for not against healthcare reform would be a start (or not paying for those lobbyists altogether would further maximize profit) Deny Oxford their rate increase.

Prior Approval Submission
NYS Department of Financial Services
To: PremiumRateIncreases

06/20/2014 04:31 PM

Oxford Health Insurance, Inc.
group
epo
[redacted]
We have just received a letter from Oxford Health Insurance that indicates that they have requested an increase of 11.4% which comes to over $1900 a year for my small business. It is my understanding that in all the time we have had a plan from Oxford, the NY State Insurance Commission has ALWAYS granted them increases when asked. One year in particular, if my memory serves me, Oxford was given an increase of up to 65%. Our health insurance went up 65% that year. I am seriously considering moving my company to another state to avoid these ridiculous and excessive increases. I am urging you to NOT grant this year's increase. Our insurance levels are already outrageously high.

United Health Care P PPO 20/30 F Non-Gated OHI,

[redacted] to: premiumrateincreases 06/21/2014 01:51 PM

To Whom It May Concern:

I am a small employer in NY and have a group plan with United Health Care. Health care insurance is one of the highest expenses that I incur each month as an employer. Premiums rise every year automatically and the fact that they are looking to increase the rates even higher next renewal is very disturbing to me. I just don't understand how out of control health care costs have become. I think that what needs to be done is audits of hospitals and health care providers to see who is fraudulent and causing such outlandish premiums for us poor small businesses who are just trying to stay afloat in this economy. Insurance is a necessary evil but quite frankly, it takes food off my table to pay these bills every month. I hope you do not agree to their request.

[redacted]

Prior Approval Submission
NYS Department of Financial Services
To: PremiumRateIncreases

06/21/2014 02:12 PM

Oxford Health Insurance, Inc.
group
epo
[redacted]
Our EPO Plans renewed in June 2014 within the newly DFS approved PCACA (affordable care act) with the carrier. The prior plans were already increased, but the jump between the prior plan and the newly PCACA plans was more than $100 dollars per plan per month. I ask DFS to review and take into consideration prior year increases and the increase differences between the prior year and the PCACA plans rates quarterly and annual increased comparison overall. With continual yearly increases since 2010, I urge the DFS to not approve rate increases. There has to be a point where the rates remain the same or actually decrease? Where is the ethics or justification to the four (4) years of huge premium increases?

CPI averages 2% but United Health Care wins 11% to 40% increases!!!!!!! EVERY YEAR thanks to DFS !!!!!!

[redacted] to: premiumrateincreases 06/21/2014 09:34 PM

To whom it may concern,

without giving me a form response I would like a human *custom* answer to this question as to why your department does not seem to ever stand up and say "no" to the insurance companies requests for increases and force them to show US ALL where that money is going for real:

Let's look at my provider, Oxford (United Health Care) plan (S EPO HSA 2k 25/50 non-gated OHI) as an example. It seems every year they request increases that are at least 5 to TWENTY TIMES the CPI index (inflation rate) for the united states!!!!!!!!!!

Now let's look at what they pay out to the medical community, (doctors and lab tests). As an example, a provider might request $113 for a blood test - Oxford pays typicall between $13 and $23 as the negotiated rate acrtoss a brtoad range of blood tests!!! Typically Oxford has negotiated rates that are over five times LOWER than the doctor or blood lab requests!!!!!

Now a doctor bill, typically a patient visit in my region might costs $150 - Oxford has negotiated rates of $60 or as low as $40 in some cases!

So, with all the money that Oxford is SAVING with well BELOW WHOLESALE payouts - and all the money that Oxford is MAKING in their TREMENDOUS increases that are always approved by your organization, there appears to be somebody not doing their job. what do I mean> Well, while all us subscribers continue to suffer - DFS does not appear to have a backbone and flat out DENY increases!!!!!) What the heck is going on? Where is all that money going that United Health Care gets! It is not going to the doctors and it is not going to us subscribers!!!!

So, what's up?!? Get a backbone New york state and JUST SAY NO, NO NO to Oxford NO NO NO to United Health Care requests.

So many other countries have a handle on their health care but the unites states does not. (For example Costa Rica is $40 per month per person and they have life span on par with the united states - why is that? Why is everyone flocking to other coutries for health care now?) If your department wants Obama Care to work, then DFS has to DENY these insurance crate increases!!! It has NOTHING to do with rising cost of health care as they CLAIM!!!!

We know United Health Care pays out GARBAGE to the medical community! EVERYONE

knows it! So, do they deserve to make all that money for themselves? There must be another way. Say NO to rate increases that exceed the CPI rate (cost of living index) which averages only 2% per year!!!!!

Thank you for your time and remember - it is criminal to allow rate increases that are clearly more for the insurance companies then anyone else. We have rights and regulations - protect us as you should. Now is the time for New York to stand up against this atrocity.

I would like detailed proof of how medical costs PAID OUT by United Health CARE are increasing even close to FIVE TIEMS the CPI 9 which is the requested rate inclrease for this year (12% per quarter, that's 40% over the year are you kidding? Even 12% is just too much but a 40% increase over the year - is that even close to legal?)

Thank you for your time for a *human written* *custom to this email* response.

Prior Approval Submission
NYS Department of Financial Services
To: PremiumRateIncreases

06/21/2014 10:04 PM

Oxford Health Insurance, Inc.
group
other
[redacted]
My plan name is S EPO HSA $2000 L Non-Gated OHI, the premium for this plan is high enough. I personally object to any premium increase.

Prior Approval Submission
NYS Department of Financial Services
To: PremiumRateIncreases

06/22/2014 01:01 PM

Oxford Health Insurance, Inc.
group
ppo
[redacted]
I received a letter from Oxford proposing a blanket increase in my premium rate of over 11%. They remark that there have been "increases in the cost of medical services." Has Oxford raised the payment to doctors proportionally? As a doctor, as well as a patient, I am aware of both paying for insurance and being paid by insurance. What is the evidence that this proposed increase is not so that the CEO and other executives can have even higher 7 and 8 figure salaries verses the suggestion that it is for medical care (increased cost of payments to doctors)? Is there a breakdown of where these fees will go avaiilable to the public?

Prior Approval Submission
NYS Department of Financial Services
To: PremiumRateIncreases

06/22/2014 04:21 PM

Oxford Health Plans (NY), Inc.
group
hmo
[redacted]
VEHEMENTLY opposed to premium rate increases... please say NO! I'm currently insured by Oxford Health Plans (NY), Inc. (OHPNY) ...It also seems to go by the name UnitedHealthcare Oxford (as is printed on my card) I have a sole proprietor Group Plan MG1515. The plan - according to the letter I just received - is named G HNY HMO 25/40 L Gated OHP I earn very little money as a self-employed consultant. When the NY State of Health plan came in, I was under the impression that my health insurance would finally become more affordable. It did not... The monthly payment went up slightly, from $510 per month, to $522. NOW I'm getting a letter from UnitedHealthcare, stating that they're putting in a request to raise premiums another 22%!?!?! If this happens, I'll have to head to a broker and try to downgrade in a BIG way. I can barely afford the premium as it is.. PLEASE say no to United Healthcare Oxford's request. Thank you. Miriam

Prior Approval Submission
NYS Department of Financial Services
To: PremiumRateIncreases

06/22/2014 04:25 PM

Oxford Health Plans (NY), Inc.
group
hmo
[redacted]
UnitedHealthcare Oxford a.k.a. Oxford Health Plans (NY) recently sent a disturbing letter where they are apparently lobbying to have our premiums raised 22%.. The email that they provided in the letter (for us to lodge complaints) was a total fake, and my letter bounced back. It was: A really sneaky move. Please deny their request... because non of us will be able to afford it!

premium rate increase

[redacted] to: premiumrateincreases@dfs.ny.gov 06/23/2014 01:01 PM

Hello,

I am writing about a notice I received in regards to a premium rate increase to my Oxford Health Insurance health plan (G EPO 20/40 F Non-Gated OHI).

I am asking that the New York State Department of Financial Services deny this request for a rate increase. We were already stuck with a substantial rate increase last year (over 10% if I recall correctly) and now they are proposing to raise my premium another 11% or more.

Our premiums are becoming cost-prohibitive and the service I receive for this is by far not the best health coverage I have ever had. If this continues I will consider cancelling my insurance and just paying the penalty the new law requires.

I thank you for considering this matter and look forward to seeing my premiums stay the same.

With best regards,

[redacted]

Account Manager

[redacted]

Oxford rate increase

[redacted] to: premiumrateincreases 06/24/2014 11:31 AM

Dear Sir:

I think I speak for everyone in NY when I suggest that Oxford / United Health Care charges enough and they don't need an 11 or 12% increase. Everyone knows the charges for health care do not even come close to the actual costs involved so I would respectively ask that you refuse this increase.

I am sure you will not receive any emails saying that someone wants a rate increase or thinks it makes sense!!

Thank you very much

[redacted]
C EPO 20/40 Group Plan

rates??

[redacted] to: premiumrateincreases 06/24/2014 11:57 AM

OK please help me understand what is going on with the rate increase?
My rates already did go up, AND my co-pay increased. AND I now have a deductable as well.

NOW you want to charge more money for me to have to pay out more out of pocket money.

Seems fair enough, does this mean you are going to pay the doctors more?
The payment rates for physicians went down.... so you charge the person more money, then turn around and pay out less money to the physician.
Where is all the extra money going?

You dear reader, are YOU personally reaping the benefits?? I'm sure you personally are not.

I am extremely opposed to the rate increases!!

Thank you for taking the time to read this.

[redacted]

Liberty HMO thru Oxford
Group coverage

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Prior Approval Submission
NYS Department of Financial Services
To: PremiumRateIncreases

06/25/2014 12:15 PM

Oxford Health Insurance, Inc.
group
ppo
[redacted]@[redacted]
As a small group participant, I cannot survive another rate change. Rates were increased last year! My company is charged $588 a month. I pay $176.40 every month. Office visits with a primary car provider increased from $25 to $40 and to see a specialist has increased from $50 to $75. I had surgery last year and have now been diagnosed with a chronic condition. I'm spending almost $400 a month on my healthcare, not including medications. My annual gross is less than $42K. I can't meet my monthly bills and student loans. How is this healthcare plan benefiting me if you raise the rates again?

Proposed Premium Rate Change United Healthcare Oxford
[redacted] to: premiumrateincreases@dfs.ny.gov 06/25/2014 12:50 PM

RE: Notice of Proposed Premium Rate Change
P EPO 10/20 Non-Gated OHI, GA 1536

Insurer Name: United Healthcare/Oxford
Plan Name: German Academic Exchange Service GA1536
Group Coverage
EPO 10/20 Non-Gated OHI, GA 1536

Dear NYS Department of Financial Services,

I'm writing to strongly protest the proposed increase in health insurance premiums submitted to you for approval by United Healthcare/Oxford.

Since we signed up with Oxford in 2007, our rates have increased exponentially every year, while the services covered have gone down.

If rates in 2015 increase by 11.3% the monthly premium for a single employee will be $925 a month!! We are a small employer, funding and facilitating academic exchange programs for US students wishing to study in Germany. By no means can we keep up with the raising health insurances cost. Our cost increased

16.88% in 2010
14.77% in 2011
2.87% in 2012
9.57% in 2013
11.68% in 2014

and
possibly 11.3% in 2015.

This has to stop.

We were not able to give raises or even standard-of-living adjustments to our employees since 2009. Since our employees contribute to their health insurance costs their take home pay has gone down over the last 5 years.

We kindly ask NYS Department of Financial Services to please do anything in their power to stop United Healthcare/Oxford from continuing their outrages premium increases.

Thank you very much.

With best regards,

[redacted]

[redacted]

Prior Approval Submission
NYS Department of Financial Services
To: PremiumRateIncreases

06/25/2014 01:15 PM

Oxford Health Insurance, Inc.
group
ppo
[redacted]
I am the both the employer who provides the plan (G PPO 25/40 Non-Gated OHI), as well as a participant. Last year our annual premium was raised 40% for essentially the same coverage. I do not feel that another rate hike is warranted .At this point, this plan is becoming unaffordable.

Proposed Premium Rate Change

[redacted] to: premiumrateincreases 06/25/2014 01:44 PM

To whom It may concern:

We have just received notice of a proposed 15.7% premium rate change for the following health insurance coverage:

Carrier: UnitedHealthcare Oxford
Plan: G HMO 30/60 L Gated OHP
Coverage: Small Group Off Exchange

It is unbelievable to me that an increase of this magnitude would be entertained. UnitedHealthcare's rationale that it is necessary due to rising medical costs is irresponsible and spurious. We have been insured with them since 2012, and if an increase of this magnitude is granted our premiums will have risen 56.4% in a 3 year period, bringing our new premium to $1464.27 for coverage that is restricted to their network, and requires a $30 copay for a visit to our primary physician and a $60 copay for a visit to a specialist.

Please consider carefully the impact an increase of 15.7% will have on small business owners who have certainly not seen a similar increase in their revenue. My husband and I are the only employees of our business, and we fear that we will be driven out of business by the rising cost of health insurance.

I hope you will agree that acceding to UnitedHealthcare's voracious appetite will be damaging not only to us, but to countless businesses like ours.

Very truly yours,

[redacted]

[redacted]
2nd Floor
Long Island City, NY 11101
[redacted]

Oppose of Rate Increase

[redacted] to: premiumrateincreases@dfs.ny.gov 06/25/2014 02:34 PM

I am [redacted], and I have a group coverage by my employer, [redacted] with United Healthcare, **Oxford Liberty HMO (Health Plan 911-06111-07**). The plan name is **G HMO 30/60 L Gated OHP**. The office had just started this new plan in March or April of this year under the Obama health care bill. The rate was much higher than the one before already, now only few months down the road, I received a notice from United Healthcare Oxford saying that they have filled a request with NYS' DFS for rate increase. It is outrageous!!! I believed President Obama had promised for affordable care for all citizens. It is not affordable to me and I am a U.S. citizen. The increase of the premium rate change is not acceptable to me. Please review and stop the health insurance company's monopoly.
Thank you. [redacted]

Sent from Windows Mail

Prior Approval Submission
NYS Department of Financial Services
To: PremiumRateIncreases

06/25/2014 03:06 PM

Oxford Health Plans (NY), Inc.
group
hmo
[redacted]
Oxford renewal came with an increased of 140% in specialist co-payment from $50 to $70 and 160% for primary doctor together with a large increased on co-payments in pharmacy and hospital procedures. Any increase should be absolutely denied.

Fw: NYS Department of Financial Services Consumer Assistance Unit Inquiry
Consumers to: Premium Rate Increases - Public Comments 06/26/2014 09:35 AM
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] alb/nysdfs on 06/26/2014 09:35 AM -----

From: [redacted]
To:
Date: 06/26/2014 04:53 AM
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:
Your Company/Organization:
Daytime Telephone#:
You are a(n): CONSUMER
Type of Insurance question/comment: HEALTH

Your Questions and/or Comments have been recorded as follows:

* *

MY HEALTH INSURANCE CO.(OXFORD)increase my group plan 25% for 2014-2015. Premium went from $635 for single to $852. A recent letter stated another 11.4% increase for 2015. Is this valid.

* *

Sincerely,

New York State Department of Financial Services
Consumer Assistance Unit.
email at: consumers@dfs.ny.gov

United Health Care Oxford Request for Rate Increase

[redacted] to: premiumrateincreases 06/26/2014 11:48 AM

Dear Sir or Madam,

I received a letter from UHC regarding Proposed Premium Rate Increases for 2015.
As both the only Insured and the Benefits Administrator of this small group plan, I can am fully aware of the annual rate increases Oxford has imposed on us over the last 15 years.
Without notice, my premium and/or plan structre has been changed annually at least 10% a year with the exception of the 2014 when all plans were restructured to meet ACA requirements.
My premium for a single female is now $923.40 under a small group plan, and if it continues to go up, I am absolutely worried that my Employer will do away with the plan or have me pay a large portion of it.
I earn a modest income and having to fund a health insurance plan would be a major expense for me.
As a single full-time working female for a small company, health insurance is the only benefit I receive. I have no pension, 401-k, or life insurance through my company. I therefore feel that I should not be penalized and have this benefit potentially taken from me through private insurance and be forced to switch to one of the NYS plans.
I understand the cost of healthcare increases but the amount of money they want per individual/family has actually become obscene.
This is my appeal to UHC's request.

Thank you for your attention.
Sincerely,
[redacted]

[redacted]
P PPO 10/20 F Non-Gated OHI
Small Group Coverage

[redacted]

[redacted] to: premiumrateincreases 06/27/2014 10:06 AM

Oxford
Health Plan: (80840) 911-06111-07
group coverage
G HNY HMO 25/40 L Gated OHP

Hello, this is [redacted] from [redacted] would not like the rate increase. I am already paying too much due to the increase from Obama Health Care. I do not have the ability to continue with this health insurance if this rate increases and will have to stop receiving health insurance. If this requested rate change is disapproved, that would be greatly appreciated. Thank you.

proposed rate increases for United HealthCare /Oxford

[redacted] to: premiumrateincreases 06/27/2014 06:25 PM

June 27, 2014

NYS Dept. of Financial Services

Health Bureau – Premium Rate Adjustments

1 State Street

NY NY 10004

To Whom It May Concern:

I am writing to protest any increases in the rates charged by United Healthcare/Oxford for 2015. I am currently insured with Oxford Freedom Plan through my husband's employer and the plan name is G EPO20/40 L Non-Gated OHI. It is a group plan.

In the last two years our rates have gone up dramatically, and our co-pays have also risen. However, there has been a substantial reduction of benefits and the insurance company is covering many less services and increasing the co-pays dramatically for all the services that they have covered in the past. I recently went for a test recommended by my doctor that I have done yearly for 10 years and instead of the co-pay of $300 that was charged in 2013, I was told the co-pay would be $1600. Needless to say I can't afford to have that test anymore despite the fact that it is recommended for someone with my illness.

I don't understand how my family, and all the other families who are insured with this company, keep paying more and more in premiums yet seem to have less and less coverage, or extraordinary co-pays which prevent us from using medically necessary tests. Yet United Healthcare/Oxford keeps posting quarterly gains and is making a lot of profit for its shareholders.

It is time to stop granting them consistent huge premium hikes when they keep providing less service and charging more for the services they do provide. None of us get anywhere near an 11.3% increase in pay and that is well beyond the rate of inflation.

Please consider a moratorium on premium increases for next year before we are all priced out of the health insurance market.

Cordially,

[redacted]

Comments on UnitedHealthcare Oxford rate change proposal

[redacted] to: PremiumRateIncreases 06/16/2014 06:06 PM

Cc: [redacted]

To Whom It May Concern:

All the policyholders (a total of 2) in our small group received a notice from UnitedHealthcare Oxford (UNH) that the company has requested an approximately 12% (twelve percent) increase in their insurance rates! The letter is dated June 12, 2014.

The letter says that we can submit comments on this submission on the DFS' website, however, your website portal does not show that UnitedHealthcare Oxford has submitted a request. We presume this is because the proposal has not yet made it to your website.

Regardless, please accept our comments herein, which are pretty straightforward:

NO consumer business raises their rates by 12% (twelve percent) a year! This is a completely absurd request. At best a request of 2 or 3% may have been considered normal. For comparison, the Government's CPI (Consumer Price Index) shows an increase of around 2 or 3% a year on average for all consumer products.
However, in addition to this 12% request, with the "Affordable Care Act" our insurance premiums already went up by 20% (twenty percent!) this year!
A 20% increase compounded by an additional 12% increase results in a 36% increase! This is c o m p l e t e l y out of line, and we sincerely hope that you realize it and deny any increase whatsoever.

We certainly maintain a sliver of hope that your agency has some sort of veto power and it does not exist to simply waive the rules that the Insurance Companies introduce. If so, we hope you realize that a 12%, much more so a 36% compounded increase, are unsustainable for the insureds.

Kind regards,

The insureds:

[redacted]

Prior Approval Submission
NYS Department of Financial Services
To: PremiumRateIncreases

06/17/2014 11:45 AM

[redacted]
group
ppo
[redacted]
This is a significant rate increase in less than one year and burdensome for small business owners who want decent and affordable health care for their employees. We selected the platinum plan so our employees would have access to good health care at a reasonable rate, but this kind of increase has the potential to price us out of that option. Furthermore, it's not as if the platinum option we selected is even that comprehensive to warrant a 12.6 percent increase - the highest listed for a small group off exchange. What crapola. Really taking the "affordable" out of the Affordable Health Care Act. **Please note that United Healthcare Oxford was not available in the drop down menu.**

Prior Approval Submission
NYS Department of Financial Services
To: PremiumRateIncreases

06/17/2014 05:22 PM

[redacted]
group
other
[redacted]
I received notice from United Healthcare Oxford that they are looking to increase my premium rates for 2015. I'm very much against this increase. I am an owner of a small business and find it difficult as-is to offer health insurance to my employees. This premium rate increase would keep me from continuing to offer it. Please feel free to email if you have any questions or would like to discuss further.
Thanks, [redacted]

Opposition to rate increase proposal of UnitedHealthcare

[redacted] to: premiumrateincreases 06/18/2014 12:08 PM

Dear Sir/Madam:

We received the notice of a proposed premium rate change from United Healthcare – Oxford. I am the only employee in our small firm who gets health insurance through this employer. My children are also covered on this plan, at my own expense. Every year, the premium rates go up significantly, to the point where my employer may soon drop the insurance plan altogether. At the same time, the co-pays and other fees increase, and many prescription drugs are either not covered or become unaffordable due to high deductibles and co-pays. It is becoming ever more burdensome to get basic family healthcare, not to mention worrying about serious illness or accidents.

I urge you to deny yet another double digit increase in premium rates, which is several times the rate of inflation. As more and more small businesses and employees are priced out of private health insurance, they will have to seek coverage from the public exchange, coverage which is likely to be even more limited, or opt for no coverage at all. That is too high a price to pay for the continued prosperity of top level insurance company executives.

Very truly yours,

[redacted]

[redacted]

United HealthCare/Oxford Rate Increases

[redacted] to: premiumrateincreases 06/18/2014 12:36 PM

Please see letter attached.
Thank you.

[redacted]

ltNYSDeptFinSvcs.6-18-14.pdf

[redacted]

[redacted]

ATTORNEYS AT LAW

[redacted]

Sender's E-Mail Address

[redacted]

June 18, 2014

BY E-MAIL (premiumrateincreases@dfs.ny.gov)
New York State Department of Financial Services
Health Bureau - Premium Rate Adjustments
1 State Street
New York, NY 10004

Gentlemen:

I received a Notice of Proposed Premium Rate Change from United Healthcare/Oxford. Before you approve any rate increase, I would request that United Healthcare/Oxford provide you with information to show why, for example, on my policy it needs a 12.3% increase. Inflation is nowhere near 12.3%, nor are salaries or rents increasing by 12.3%.

I would like a detailed explanation as to why United Healthcare/Oxford has asked for that percentage of increase, which seems to bear no reasonable relationship to other factors in the economy.

Thank you for your cooperation.

Yours truly,

[redacted]

NFC/cc
I:\Docs\General\Office\PLLC\ltNYSDeptFinSvcs.OxfordIncrease.6-14-14.wpd

Rate Increases

[redacted] to: premiumrateincreases 06/23/2014 11:50 AM

Cc: [redacted]

To Whom it May Concern,

I am a NY State Resident in Orange County NY and have a small business in NYC. I am writing because we received an increase letter from United Healthcare/Oxford and I can't for the life of me understand how this is justified. Our taxes in NY keep going up. We provide Unemployment monies to people who don't even work for our company because our gov't makes promises to unemployed people who many aren't even looking for jobs; I pay MTA taxes while the Corporate high ups at the MTA are making exceedingly higher salaries than any of us and the unemployed (why not make MTA pay their own payrolls like we do!!).

This health insurance increase isn't even used by our own govt' officials. If they don't have to use it then we shouldn't have to use it. My rates have increased dramatically. I now have a very high deductible plus I pay higher rates. I'm not sure how you are justifying not making money. Maybe you should go after the non tax payers who use the system when they get a cold and run to the emergency room. I'm so tired of paying for everyone else when no one helps small business owners.

You really have no justification for these rate increases. Everyone is paying higher rates now so why do you insurance companies keep getting to make millions off of hard working American people. I'm furious. And NY should be ashamed of themselves. The money is going into someone's pocket but it's definitely not mine. I work 14 hour days and travel back and forth to NYC almost 2 hours each way and all NY keeps doing is raising rates, taxes and keeps helping the people that give nothing to help the system. I don't mind helping others but not when they don't help themselves. **This rate is unfair to people who EMPLOY people in NYS!!!!!** How about start thinking about hard working people for a change... Justify to me your costs the same way I have to justify to our govt mine!! Because I'm pretty sure the person running this company could feed many, clothe many, pay for many people's insurance!!

When will our voices be heard by any of you???

[redacted]

UnitedHealth Oxford
[redacted] to: premiumrateincreases 06/24/2014 08:29 AM

Received a notice of a rate increase of 15-20 per cent on health care coverage. I am so sick of no one doing anything to stop this absurd spiraling of healthcare costs. The charges are off the charts and the CEO's of these companies are making ridiculous amounts of money as well as shareholders. Healthcare needs to be lowered on their rates not increased!!!! Enough is enough!!! Healthcare is a necessity and not a commodity! It is killing businesses and killing people to carry it. The government merely wants everyone dependent on it so they are allowing the escalation. It penetrates to the core and needs to be stopped. Healthcare needs should be met to help people not to make money on people-its all about big business not caring for those in need. Do something about it! It is pathetic!

[redacted]

****

Comments on United Healthcare rate increase

[redacted] to: premiumrateincreases 06/19/2014 04:02 PM

Please respond to [redacted]

Dear Sir/Madam:

As the executive director of a small nonprofit organization in New York City, I would like to comment on the recently announced request by United Healthcare to raise its rates on our policies by about 12%.

Over the past ten years, our organization has been subjected to—and I have chosen that word carefully—a series of rate increases that have averaged about 11%, as the inflation rate hovers between 2% and 3% a year. Our health insurance costs now run at 19% of salaries.

The reason that United Healthcare gives for requesting another increase, after a 12% increase last year, is "(R)ising medical expenses." I would find this to be understandable if I had not checked United Health Group's own press release about its 2013 revenue and earnings, in which it crowed about an increase in net earnings of 11%, to over $5 billion in 2013, its return on equity over 18%, a stock buy-back in full swing. (http://www.unitedhealthgroup.com/Investors/~/media/BAEBA8C7698942189F0285D5EF913154.ashx) In 2015, a family of four, under my organization's current plan, will cost $44,928 a year.

I realize that you have very little control over these rate increases, but there must be something you can do to hold these increases to somewhere NEAR the rate of inflation. United Health Group is approaching the level of windfall profits, at the expense of people's health. Small businesses will very soon be unable to provide health insurance for their employees, who will then be forced to work only for large employers if only to have the benefit of benefits. My alternative will soon be to cut employees' salaries in order to pay for their health insurance, or to offer them inferior insurance plans.

Sincerely,

[redacted]

United Healthcare rate increase

[redacted] to: premiumrateincreases@dfs.ny.gov 06/23/2014 11:09 AM

Please respond to [redacted]

Dear Sir/Madam:

I am writing to express my deep concern over the continued double digit percentage increases in healthcare insurance rates each year.

While I certainly understand the costs of doing business can rise from year to year, affordable healthcare for Americans is rapidly becoming rare. As I am sure you know, wages for the majority of Americans has remained relatively flat since the great depression.

Please carefully consider holding the line on healthcare costs for 2015.

Regards,

[redacted]

UnitedHealthcare rate increases

[redacted] to: premiumrateincreases 06/25/2014 11:52 AM

As a person employed at a small business,I think it is unfair to raise rates.
We already are paying to much.
I would hope that this attempt is not approved by the government.
Thank you.
[redacted]

United Healthcare's New Rates for Individual Conversion Plan Policies

[redacted] to: premiumrateincreases 06/02/2014 03:57 PM

History: This message has been replied to.

Dear Sir/Madam,

I am writing to inquire whether the extreme PREMIUM RATE INCREASES seen in United Healthcare's new 2014 NY Conversion Plan Options have been authorized by the New York State Dept. of Insurance.

I have been insured by United Healthcare of NY for over 15 years- first while I was on COBRA, and then, once the 18-month COBRA coverage period expired, I offered UHC's Individual Conversion Plan. The plan offered a $1,000 deductible, after which UHC paid 80% and I paid 20% of the provider's bill. Also, there was a maximum of $2,000 out-of-pocket expenditure per year on my part, so if I reached that amount of out-of-pocket payments, UHC would then pay 100% of the provider's bill for the remainder of that particular year. And just as important as these benefits were, I WAS ABLE TO USE ANY PROVIDER OF MY CHOOSING- I was not confined to a network. Further, the PREMIUM WAS QUITE LOW- $276.96 (presumably because this coverage was derived from my original group plan that I had with my employer.)

HOWEVER, I just received a letter from United Healthcare dated May 28, 2014, to the effect that my current policy ends August 27, 2014, and that per the Affordable Care Act, new coverage would come into place- using the "metal" levels- bronze, silver, gold or platinum, starting August 28, 2014. They enclosed a copy of a summary of the kind of benefits covered, along with a chart showing the premium rates, depending upon the level you choose, the number of persons in your household to be covered, and your region of the State. Needless to say, I was quite shocked to see that my rate, (as a single in the New York City area) would be $884.05 per month for the Gold Level, for which your deductible is only $600, with a 80%/20% sharing of bills, BUT the maximum out of pocket would be $4,000, as opposed to the $2,000 cap that I now have. And for the Platinum Level- my monthly premium would be $1,043.26. The Platinum provides for No deductible, a 90%/10% sharing of bills, and a maximum out of pocket of $2,000. HOWEVER, NONE OF THESE NEW PLANS, INCLUDING THE MOST EXPENSIVE- GOLD AND PLATINUM- ALLOW YOU TO USE ANY OUT-OF-NETWORK PROVIDERS. Instead, the chart specifies "These are in-network plans using the Choice Network."

Please note that I also verified the above information with several UHC representatives on the phone this morning. And none were able to tell me how I might access the list of their Choice Network providers, so that I may make an informed choice. (I tried for several hours on my computer to find out about the UHC Choice Network, to no avail.) Instead, I was finally told by someone (who spoke to her supervisor) that once I sign up for the plan and mail back the signed application, they would send me a copy of the policy and a list of the Choice Network providers. And if I did not like what I saw, they would agree to cancel the policy and give me my money back.

But as I'm sure you can appreciate, it would be much better to be fully informed BEFORE you sign up for a plan, given the fact that you do not want to be left with any gaps in coverage, etc. (Note that while UHC surely must have known what their new rates would be back in January of

this year, they nonetheless waited until the end of May to send me their letter and policy proposal. As such, I missed the New York State of Health's open enrollment period that ended in March, and it will not begin again until November 15, 2014. (I did, however speak to a representative at NYState of Health this morning, and she said that since my current policy is ending in August, they may be able to "unblock" my application to view the marketplace and/or sign up for coverage with NY State.

Again, however, I am dumbfounded that UHC IS NOW OFFERING AN INFERIOR POLICY- because one must use only their in-network providers- and- that they have TRIPLED MY USUAL PREMIUM RATE AS WELL. (One of the reps said that if I get a UHC policy through the NY marketplace, "the premiums may be lower, but the policy will be different" But he was unable to tell me in what ways it would be different from what they have just proposed to me!)

I thank you for the time that you are taking to consider my questions, and I look forward to hearing from you.

Sincerely,

[redacted]

Prior Approval Submission
NYS Department of Financial Services
To: PremiumRateIncreases

06/22/2014 11:58 PM

UnitedHealthcare of New York, Inc.
group
epo
[redacted]
UnitedHealthCare stock was up over 27% in the last 52 weeks. CEO [redacted] compensation was 1.3 mil salary and 1.95 bonus and according to Forbes a whopping 101.96 mil in 2013 COO/CFO [redacted] compenstaion was 8.115 million in 2013 according to forbes . A simple search of company profits and compensations can be found in minutes on the web. And these people are requesting an over 10% increase in premiums! I'd think that public companies can generate internal numbers that show a projected loss but stock prices and salaries don't lie. Maybe someone should listen to one of the companies' conference calls for stockholders. It should prove more informative than 'projected' profits from cost and utilization data provided by company hired accountants.

Comments on UnitedHealthcare Oxford rate change proposal

[redacted] to: PremiumRateIncreases 06/16/2014 06:06 PM

Cc: [redacted]

To Whom It May Concern:

All the policyholders (a total of 2) in our small group received a notice from UnitedHealthcare Oxford (UNH) that the company has requested an approximately 12% (twelve percent) increase in their insurance rates! The letter is dated June 12, 2014.

The letter says that we can submit comments on this submission on the DFS' website, however, your website portal does not show that UnitedHealthcare Oxford has submitted a request. We presume this is because the proposal has not yet made it to your website.

Regardless, please accept our comments herein, which are pretty straightforward:

NO consumer business raises their rates by 12% (twelve percent) a year! This is a completely absurd request. At best a request of 2 or 3% may have been considered normal. For comparison, the Government's CPI (Consumer Price Index) shows an increase of around 2 or 3% a year on average for all consumer products.
However, in addition to this 12% request, with the "Affordable Care Act" our insurance premiums already went up by 20% (twenty percent!) this year!
A 20% increase compounded by an additional 12% increase results in a 36% increase! This is c o m p l e t e l y out of line, and we sincerely hope that you realize it and deny any increase whatsoever.

We certainly maintain a sliver of hope that your agency has some sort of veto power and it does not exist to simply waive the rules that the Insurance Companies introduce. If so, we hope you realize that a 12%, much more so a 36% compounded increase, are unsustainable for the insureds.

Kind regards,

The insureds:

[redacted]

Prior Approval Submission
NYS Department of Financial Services
To: PremiumRateIncreases

06/17/2014 11:45 AM

[redacted]
group
ppo
[redacted]
This is a significant rate increase in less than one year and burdensome for small business owners who want decent and affordable health care for their employees. We selected the platinum plan so our employees would have access to good health care at a reasonable rate, but this kind of increase has the potential to price us out of that option. Furthermore, it's not as if the platinum option we selected is even that comprehensive to warrant a 12.6 percent increase - the highest listed for a small group off exchange. What crapola. Really taking the "affordable" out of the Affordable Health Care Act. **Please note that United Healthcare Oxford was not available in the drop down menu.**

Prior Approval Submission
NYS Department of Financial Services
To: PremiumRateIncreases

06/17/2014 05:22 PM

[redacted]
group
other
[redacted]
I received notice from United Healthcare Oxford that they are looking to increase my premium rates for 2015. I'm very much against this increase. I am an owner of a small business and find it difficult as-is to offer health insurance to my employees. This premium rate increase would keep me from continuing to offer it. Please feel free to email if you have any questions or would like to discuss further.
Thanks, [redacted]

Opposition to rate increase proposal of UnitedHealthcare

[redacted] to: premiumrateincreases 06/18/2014 12:08 PM

Dear Sir/Madam:

We received the notice of a proposed premium rate change from United Healthcare – Oxford. I am the only employee in our small firm who gets health insurance through this employer. My children are also covered on this plan, at my own expense. Every year, the premium rates go up significantly, to the point where my employer may soon drop the insurance plan altogether. At the same time, the co-pays and other fees increase, and many prescription drugs are either not covered or become unaffordable due to high deductibles and co-pays. It is becoming ever more burdensome to get basic family healthcare, not to mention worrying about serious illness or accidents.

I urge you to deny yet another double digit increase in premium rates, which is several times the rate of inflation. As more and more small businesses and employees are priced out of private health insurance, they will have to seek coverage from the public exchange, coverage which is likely to be even more limited, or opt for no coverage at all. That is too high a price to pay for the continued prosperity of top level insurance company executives.

Very truly yours,

[redacted]

[redacted]

[redacted]

[redacted]

ATTORNEYS AT LAW

[redacted]

Sender's E-Mail Address

[redacted]

June 18, 2014

BY E-MAIL (premiumrateincreases@dfs.ny.gov)
New York State Department of Financial Services
Health Bureau - Premium Rate Adjustments
1 State Street
New York, NY 10004

Gentlemen:

I received a Notice of Proposed Premium Rate Change from United Healthcare/Oxford. Before you approve any rate increase, I would request that United Healthcare/Oxford provide you with information to show why, for example, on my policy it needs a 12.3% increase. Inflation is nowhere near 12.3%, nor are salaries or rents increasing by 12.3%.

I would like a detailed explanation as to why United Healthcare/Oxford has asked for that percentage of increase, which seems to bear no reasonable relationship to other factors in the economy.

Thank you for your cooperation.

Yours truly,

[redacted]

NFC/cc
I:\Docs\General\Office\PLLC\ltNYSDeptFinSvcs.OxfordIncrease.6-14-14.wpd

Rate Increases

[redacted] to: premiumrateincreases 06/23/2014 11:50 AM

Cc: [redacted]

To Whom it May Concern,

I am a NY State Resident in Orange County NY and have a small business in NYC. I am writing because we received an increase letter from United Healthcare/Oxford and I can't for the life of me understand how this is justified. Our taxes in NY keep going up. We provide Unemployment monies to people who don't even work for our company because our gov't makes promises to unemployed people who many aren't even looking for jobs; I pay MTA taxes while the Corporate high ups at the MTA are making exceedingly higher salaries than any of us and the unemployed (why not make MTA pay their own payrolls like we do!!).

This health insurance increase isn't even used by our own govt' officials. If they don't have to use it then we shouldn't have to use it. My rates have increased dramatically. I now have a very high deductible plus I pay higher rates. I'm not sure how you are justifying not making money. Maybe you should go after the non tax payers who use the system when they get a cold and run to the emergency room. I'm so tired of paying for everyone else when no one helps small business owners.

You really have no justification for these rate increases. Everyone is paying higher rates now so why do you insurance companies keep getting to make millions off of hard working American people. I'm furious. And NY should be ashamed of themselves. The money is going into someone's pocket but it's definitely not mine. I work 14 hour days and travel back and forth to NYC almost 2 hours each way and all NY keeps doing is raising rates, taxes and keeps helping the people that give nothing to help the system. I don't mind helping others but not when they don't help themselves. **This rate is unfair to people who EMPLOY people in NYS!!!!!** How about start thinking about hard working people for a change... Justify to me your costs the same way I have to justify to our govt mine!! Because I'm pretty sure the person running this company could feed many, clothe many, pay for many people's insurance!!

When will our voices be heard by any of you???

[redacted]

UnitedHealth Oxford
[redacted] to: premiumrateincreases 06/24/2014 08:29 AM

Received a notice of a rate increase of 15-20 per cent on health care coverage. I am so sick of no one doing anything to stop this absurd spiraling of healthcare costs. The charges are off the charts and the CEO's of these companies are making ridiculous amounts of money as well as shareholders. Healthcare needs to be lowered on their rates not increased!!!! Enough is enough!!! Healthcare is a necessity and not a commodity! It is killing businesses and killing people to carry it. The government merely wants everyone dependent on it so they are allowing the escalation. It penetrates to the core and needs to be stopped. Healthcare needs should be met to help people not to make money on people-its all about big business not caring for those in need. Do something about it! It is pathetic!

[redacted]

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