



[To:](#)
Cc:
Bcc:
Subject:

From:
To: premiumrateincreases@dfs.ny.gov
Date: 06/13/2013 10:20 AM
Subject: OPPOSITION to EMPIRE RATE INCREASE

Health Bureau-Premium Rate Increases

Please be advised that my EmpireHeath Choice "Plan A" premium has increased, in one year, from \$441.30 to the proposed \$557.73 which totals \$465.72 annually.

This one year increase far exceeds the CPI and exceeds my ability to pay. I am [REDACTED] year old retiree on a fixed income that actually declines resultant inflation.

Empire's proposed rate increase is grossly unfair and unjustified.

Thank you.

From:
To: premiumrateincreases@dfs.ny.gov
Date: 06/13/2013 07:25 PM
Subject: RE: Empire BCBS Medicare Supplement Rate Increase

In the matter of subject rate increase, kindly note same is well beyond CPI (1.6% for January 2012 through January 2012), and has become an annual right-of-fleecing-the-policy-holder by Empire. Empire HealthChoice Assurance, Inc. doesn't quantify, qualify or otherwise justify the increase with any references to **its** costs, stating only, *"Each year, rising medical costs and the growing use of medical goods and services combined, drive health care costs higher. To keep up with these increasing costs, we must modify premium rates for your Medicare Supplement plan, tentatively effective on January 1, 2014."*

In it's submission to NY DFS, Empire stipulates



[To:](#)
Cc:
Bcc:
Subject:

From:
To:
Date:
Subject:

Dear Sir or Madam,

Ref. Medicare Supplement Plan B

Please consider and **reject** the proposed Empire BlueCross, BlueShield insurance rate increase slated for January 1, 2014. My mother [REDACTED], who will be [REDACTED] years old this year, lives primarily on her Social Security and this rate increase will be prove to be an unreasonable burden. This especially after the rate increase just last year. This new proposed increase will literally wipe out the small cost-of-living increase she received from Social Security this year.

Thank you.

Most Sincerely,

From:
To:
Cc:

Date:
Subject:

My wife and I are very concerned about Empire's recent announcement concerning their pending rate increases effective 1/1/2014! We are barely getting by with the 2013 increases! This additional request will bump our rates by 15%. There is no justification for an increase this LARGE! We strongly suggest that DFS refuse to grant an increase of this size!! Thank you.

From:
To:
Date:
Subject:

To whom it may concern:

I am writing this on behalf of my mother [REDACTED] of [REDACTED]
[REDACTED].

Attached is a letter from Empire BC/BS.

It is in reference to a Proposed Rate increase of nearly 10 per cent of what her current premium is.

She just has a premium increase last November 2012.

Now Empire BC/BS is requesting an increase of close to \$60.00 (nearly 10%).

This is ridiculous and outrageous. Where will she obtain these monies to cover this increase?

Please do whatever is in your power to see that this request is not approved.

From:
To:
Cc:
Date:
Subject:

Good Day,

I am appealing your rate increase for my mother, [REDACTED], who cannot speak for herself now. I am her advocate for several years. She is in a nursing home and this additional insurance cost is quite extensive. I have to pay this separately for the entire year.

I am my mother's health care proxy, and I know that she needs to have this coverage continued.

I have to also pay my own insurance which is an added burden for a working person.

Please waive this increase for my mother, as she has been a customer of yours for so many years, and she really needs your added coverage at this point in her life.

Thank you.

Good Day,

I am writing on behalf of my mother [REDACTED]

I received yet another increase notice in the mail pertaining to her Plan B insurance.

Why are elderly people getting these incessant increases?

She is in a nursing home.

From:
Sent:
To:
Cc:
Subject:

My wife and I are very concerned about Empire's recent announcement concerning their pending rate increases effective 1/1/2014! We are barely getting by with the 2013 increases! This additional request will bump our rates by 15%. There is no justification for an increase this LARGE! We strongly suggest that DFS refuse to grant an increase of this size!! Thank you.

From:
To:
Date:
Subject:

Thanks for the opportunity to comment on the newest proposed increase. Empire increased the premium last year by about \$12 a month and now proposes to increase it again by almost \$25 a month. This is unconscionable. \$37 in 2 years! Seniors cannot afford this and at this age, it's especially important to keep the doctors we've been seeing for many years, so we need Medigap policies rather than Medicare Advantage, and we need them to be affordable. Please do not approve this rate increase.

Thank you,

From:
To:
Date:
Subject:

I have Empire Mediblu Freedom 1 (PPO). Rate increase from 2012 to 2013 is astounding. Copay for specialist office visit is greater than 50% of the negotiated payment to the provider. The monthly premium for the insured is \$38.00 for policy; versus \$0 dollar premium in year 2012. I ask NYS DFS to review these dramatic increases for rollback consideration and not be bullied by ins. carrier muscle and fancy powerpoint data showboating.

I. OVERVIEW

Empire Blue Cross (Empire) has submitted an application to the Superintendent of Insurance to adjust premium rates for health insurance available to Medicare Supplement enrollees. The line of business impacted is the 2010 Standardized Medicare Supplement Insurance Plans sold by Empire HealthChoice Assurance, Inc. (Empire's insurance company; NAIC code number 55093). The actual rate increases requested are provided below. Empire's proposed rates are subject to review and approval by the New York Department of Financial Services, with the determination by the Department supported by sound actuarial assumptions and methods. The rate application will be filed with the Department on June 6, 2013 (SERFF number: pending). The actual rate increases approved will be communicated to the impacted parties upon completion of the Department's review and are scheduled to be effective beginning on January 1, 2014.

The proposed rates are applicable to individuals enrolled in a Medicare Supplement plan on or after June 1, 2010. Rates are expected to be in force between January 1, 2014 and December 31, 2014. All members will receive this rate change on the January 1, 2014 effective date. The rate for any individual will vary based on geographic area and benefit Plan selected.

Empire is required by New York State law to develop rates that assume at least 65% of premium revenue will be spent on health care costs, be actuarially sound, cover all claim costs, and provide a contribution to ensure adequate reserves. The percent of premium attributable to claims is essentially how much of the premium dollar is used to pay claims and is referred to as the Medical Loss Ratio (MLR). The actual MLR may vary over time based on changes in the amounts charged by hospitals, physicians, and other providers; health care trend or inflation; and health care utilization by our members.

The requested increase in rates is due primarily to the annual increases in the cost of medical care. Empire has attempted to limit the rate increases to the lowest increases possible while preserving the financial integrity of the Plans. Periodic rate adjustments are necessary to secure the ability of Empire, or any insurer, to produce sufficient revenue to assure continued coverage and claim payments, both for current healthcare needs and for potential catastrophic cost situations.

In filing our rate application we were sensitive to the fact that individuals struggle to afford higher premiums. However, it is clear that an increase in premiums is necessary to assure the continued operations and viability of the Plans. Because these particular products have an especially high MLR, the failure to approve the proposed rates will only lead to the need for even greater rate increases in the future, since claim costs will eventually exceed premiums collected.

In other words, 'medical costs are going up - not necessarily ours - but let's get us some premium increases!'

In a report by examiner [REDACTED] [REDACTED] appointed by the Superintendent of Insurance for the State of New York, dated September 27, 2002, manifold irregularities were found. DFS may well need to investigate whether or not the "increasing costs" Empire HealthChoice Assurance, Inc. needs to keep up with are for legitimate costs consistent with its non-profit stated mission of insurance provision, or excesses benefitting its officers, (as was found in the referenced 2002 examination of this paragraph).

Senior citizen income isn't rising at a rate of 15% per annum. It is consistent with the responsibilities of DFS and the Superintendent of Insurance that inquiries be initiated as to just **which** EmpireBCBS costs (not those of medical insurers in general), have increased to more than double digit levels - are the officers and management of this enterprise contravening stated policy again for their own comfort and gain?

Thank you for your consideration.

Respectfully,

From:
To: PremiumRateIncreases@dfs.ny.gov
Date: 06/14/2013 10:59 AM
Subject:

From:
To: PremiumRateIncreases@dfs.ny.gov
Date: 06/14/2013 11:00 AM
Subject: Re: Empire BlueCross BlueShield Increases

I have just been informed that my rate has been increased by \$60 on my next statement.

As a retired person this is going to be a great hardship; previous rate was \$600; also had risen not long ago.

I have no health issues and feel unfairly penalized by others that do.

Please keep this in mind when you vote on this increase.

Thank you for your careful attention to this matter.

Very truly yours,

From:
To: PremiumRateIncreases@dfs.ny.gov
Date: 06/14/2013 12:54 PM
Subject: Protesting Rate Increases

My premiums went from \$140. to \$161. and now a proposed 185.91. Its obvious the Obama Care Plan is causing many Americans to pay for all Americans who need insurance. This is absurd. Retired persons are strapped enough. We need to have supplements that can take care of us the way we expected to be taken care of medically; not forced to swallow an advantage plan HMO or PPO that gives us less than desired results. Speaking from experience with family members I've seen what happens when tests are not covered and specialists that won't see you. I'd let them write too but, they are dead! I want my supplement to be affordable. Between Medicare, Drug coverage and my supplement without the increase, is way more than I thought I would have to pay for health insurance at █ years old. Shame on all of you, from the President down!

From:
To: "PremiumRateIncreases@dfs.ny.gov" <PremiumRateIncreases@dfs.ny.gov>
Cc: "Premiumratechange@empireblue.com" <Premiumratechange@empireblue.com>
Date: 06/15/2013 02:40 PM
Subject: Empire BlueCross BlueShield Proposed Rate Increasesme

To Whom It May Concern:

Empire's proposed new rates represent a 10.3% increase---well above the +/- 2% inflation rate. What's more, it comes at a time when Social Security cost-of-living adjustments are set to *decrease* due to a change in the COG benchmark. In addition, the proposal comes only a year after the last one, and at a time when Medicare is working to reduce its payments to providers. This means Empire's 20% may actually *fall*, further fattening its bottom line.

Thus, one can only conclude that Empire's motives are driven by the desire for ever-higher profit margins. And because the health insurance industry successfully convinced legislators that each Medicare recipient must buy an individual supplemental policy, married couples in the system are denied the standard "family discounts" typically offered non-Medicare customers. The result: Both my wife and I are forced to purchase two *identical policies* ---at full price!

If Empire's increase is approved, it will cost my wife and I \$5,302.08 annually, or roughly 13% of our combined Social Security income. This on top of the monthly deductions for Part B and Part D coverage, and the increased Part A Deductible. Taken together, these costs amount to almost \$10,000.00 annually! It's enough to make a person sick!

Sincerely,

From:
To: "premiumrateincreases@dfs.ny.gov" <premiumrateincreases@dfs.ny.gov>
Date: 06/15/2013 10:10 PM

From: NYS Department of Financial Services <portal@dfs.ny.gov>
To: PremiumRateIncreases@dfs.ny.gov
Date: 06/17/2013 10:41 AM
Subject: Prior Approval Submission

Empire HealthChoice Assurance, Inc.
individual
medicaresupplement

The rate increase from 567.87 to 653.02 represents an an apx. 14% increase. This amount is so excessive it is irresponsible. Salaries, SS benefits, and unemployment benefits have remained steady or decreased. There is no explanation for the increase except for the general

ambiguous "rising health care costs". When will it stop? Certainly other solutions can be explored. Where does this fit in with Obamacare? We will be paying extra through indirect taxes for our healthcare and now we are subjected to this just prior to Obamacare's implementation. Shame shame!!

From:
To: premiumrateincreases@dfs.ny.gov
Date: 06/17/2013 02:14 PM
Subject: Empire BCBS Proposed Medicare Supplement Increase

I am concerned with the incessant increases requested by Empire BCBS, notably the most recent 15% which that company advises it has filed for effect on January 1st, 2014. Retired people are assuredly not seeing increases of that magnitude in their incomes, nor has this insurer presented users justification for a rise to that extent, to their customers. Supposedly no such supporting data have been submitted to DFS, either. You good people to do what is necessary to prevent excess increases. Empire is supposedly a non-profit organization - what in heaven's name are they doing to hold down costs?

Respectfully,

From:
To: PremiumRateIncreases@dfs.ny.gov
Date: 06/17/2013 02:56 PM
Subject: Proposed Rate Change for Empire Blue Cross

To Whom It May Concern:

I am in receipt of a letter from Empire Blue Cross proposing a rate change for my Medicare Supplemental plan, tentatively effective on January 1, 2014.

I would urge you not to approve this rate change in view of the fact that if this change is put forward it would mean that as an individual who has participated in the plan since 2010 this increase would represent a 40 percent increase over my initial rate in 2010. In the less than three years of participating in this plan I have already experienced a 20 percent increase. I think this is absolutely prohibitive, especially since these types of plans are for Senior citizens who are on fixed incomes. It would be an absolute crime for us older citizens to have to pay this horrific increase.

Please do not approve this proposed increase.

[REDACTED]

From:
To: premiumrateincreases@dfs.ny.gov
Cc: premiumratechange@empireblue.com
Date: 06/18/2013 09:56 AM
Subject: New Rate Increase

Gentlemen: I write as a senior who must pay out of pocket for supplemental health insurance premiums. In the past 2 years that I have been retired my premium with Blue Cross have increased twice. Now a new notice has arrived stating that Blue Cross wants to increase these premiums again!...Seniors must be considered when these rate increases are allowed. Our income is fixed. Our expenses are not. Therefore, I respectfully ask that you reconsidered allowing another rate increase at this time. Blue Cross must be accountable for expenses and the services rendered to individuals before we are all "included" in such rate increases. Please allow the voice of this senior to be heard. I trust you will do a benefit to ALL seniors paying high premiums to Blue Cross.
Thank you for your attention to this email.

From:
To:
Cc:
Date: 06/18/2013 10:24 AM
Subject: Re: NYS Department of Financial Services Consumer Assistance Unit Inquiry
Sent by:

|

06/17/2013 09:08 PM

To
cc
Subject NYS Department of Financial Services Consumer Assistance Unit Inquiry

Just received a letter informing me that EmpireBlueCrossBlue Sheild is requesting a rather large rate increase again. This is the 4th increase in 2 years. They are not offering an increase in benefits along with this rate increase. I am a retired registered nurse on a fixed income. I know the importance of health care. However, if this rate increase is approved I will be forced to drop my Medicare Supplement plan I implore you to NOT approve this increase in rate as it will cause major disservice to many seniors.

From:
To: "PremiumRateIncreases@dfs.ny.gov" <PremiumRateIncreases@dfs.ny.gov>
Date: 06/18/2013 03:24 PM
Subject: Proposed Rate increase comment

The proposed rate change for supplemental insurance from Empire Blue Cross Blue Shield amounts to 10% for people on fixed incomes. Since our fixed incomes are not going up at that rate, this will create a financial hardship for those who need this insurance the most. Hardly customer friendly. While I doubt this fact will change what the insurer does, the opportunity for feedback is welcomed.

From:
To: <Premiumratechange@empireblue.com>, <PremiumRateIncreases@dfs.ny.gov>
Cc:
Date: 06/18/2013 05:14 PM
Subject: Empire BlueCross BlueShield - Unaffordable Enormous Proposed Rate Increase

To Empire BlueCross BlueShield and Health Bureau of New York State Department of Financial Services,

I was mortified to read the letter from BlueCross BlueShield proposing an enormous 10+ % medicare insurance premium increase, on top of their huge increase they imposed this past January.

My only source of income is social security, and I already can't make ends meet with the current large medical insurance premiums, and drug coverage, and co pays.

Please, please, please do not allow this premium increase – I am trying very hard to stay off of welfare.

Thank you,

From:
To: PremiumRateIncreases@dfs.ny.gov
Date: 06/18/2013 09:35 PM
Subject: Rate Increase

Due to the fact that my neighbor, does not have a computer, I am sending this request on his behalf. His name is [REDACTED] his phone [REDACTED]. Up to and including 11/01/12 to 02/01/13 I have been paying \$583.38.

The quarter 02/01/13 to 05.01/13 I was billed \$606.70 marked due to recent rate change.
05/01/13 to 08/01/13 I have paid \$600.87. At this time, Empire Blue Cross Blue Shield is asking for another increase of \$62.76 I can neither afford to pay or drop it. I am [REDACTED] years old and am living on a very restricted income.

PLEASE HELP

From:
To: premiumrateincreases@dfs.ny.gov
Cc: premiumratechange@empireblue.com
Date: 06/20/2013 08:32 PM

Subject: Empire BlueCross Blueshield proposed rate increase: OUTRAGEOUS!!!!!!

NYS Dept. of Financial Services:

These people want \$62 more from me every quarter. That's an outrageous amount! It wasn't that long ago that I paid \$583 a month, then they jacked it up to \$600 and now they want \$662.76. I am on a fixed income and I am ■ years old. Yes, I can use a computer and email in case you are wondering. You must not allow this huge rate hike by this greedy company! They make more than enough... I already pay them far more each year that they spend on me!!!

Turn this down!