

**From:** [BATYGUY@aol.com](mailto:BATYGUY@aol.com)  
**To:** [\\*COMM Public Comments HIX](#)  
**Subject:** Proposed Recommendations on Tax Savings and Tax Credits for Small Employers  
**Date:** Tuesday, September 18, 2012 8:19:48 AM

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I am a small business owner and I am opposed to any changes buy the Federal government in the health care laws of Minnesota. Commonly referred to as HIX. Minnesota has an excellent system that covers a great majority of its citizens and a Federal Takeover of our health care system would in my opinion be detrimental to the health of Minnesotans and the viability of small businesses

Minnesotans are better suited to decided their health care needs than the federal government.

Therefore I oppose HIX and any other attempts for the federal government to dictate the medical affairs of the citizens State of Minnesota.

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**From:** [Sandra Schlaefel](#)  
**To:** [\\*COMM Public Comments HIX](#)  
**Subject:** Health Insurance Exchange public comments  
**Date:** Tuesday, September 18, 2012 9:57:27 AM

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Hi,

I have some comments regarding the MN Insurance Exchange:

- **Background:** The issue of cost has been identified as one of the primary areas of concern by small employers; i.e. how do I manage the cost of providing insurance to my employees. In a recent presentation to the SETWG by Professors Amy Monahan and Daniel Schwarcz of the University of Minnesota Law School, the SETWG was informed of ways to lower the cost of coverage to employers by taking advantage of various tax savings. Some key takeaways:

Agents, Brokers and Consultants currently provide the expertise to educate and provide the solutions for the employer, HR Departments and employees on ways to save in costs for their health insurance premiums, currently. We are working in this market daily helping people. What is your intent on eliminating Agents, Brokers and Consultant roles with this exchange? Many are independent small and minority owned businesses. Is the intent for us not to be involved in the process, helping MN businesses and their employees which will ultimately have small businesses go out of business? I have been in this industry 25 years and can't believe that starting my own business 10 years ago would be viewed as such a negative by the State.

The cost of insurance (financing mechanism) is expensive because of the mandated benefits that the insurance company must pay, plus the cost of actual healthcare services. If employees don't have skin in the game, they have no incentive to control their own healthcare costs, which results in higher premiums (over utilization). Employers need to structure their insurance plans with multiple options and fund off of a core plan, allowing employees to buy-up in coverage if that better suits their household healthcare need. All the tax savings are great for the employer and employee, but by not having adequate and affordable health insurance plan options and eliminating these options to only a few plans, will drive up the employer costs.

It is hard for small employers to manage their health insurance costs because, due to HIPAA (federal law), we are not privy to claims information other than Loss Ratio information. Each renewal the agent, broker or consultant goes out to bid for their clients group health insurance and based upon the pricing, make a decision as to which insurance company and what type of plan design they are going to offer their employees. We work very hard for our customers and their employees and make sure to educate, educate and educate on wellness programs, EAPs, mail-order, generic vs. brand name, in-network provider changes, pre-taxing, Health Savings Account contributions, provider cost comparisons, as well as helping clients with individual claims issues worldwide, hold benefit meetings, provide employee electronic benefit portals, HR portals, and other independent insurance services. We help manage the employers Employee Benefit Program the best, that the law allows.

Please contact me with any questions.

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**From:** [Johansen, Kate](#)  
**To:** [\\*COMM Public Comments HIX](#)  
**Subject:** Small Employer Comments  
**Date:** Wednesday, September 26, 2012 10:45:16 AM  
**Attachments:** [MCC Comments - Small Emp - 9.24.12 PDF.pdf](#)

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Attached are the Minnesota Chamber of Commerce's comments on the small employer technical work group recommendations. I apologize for their belated submission.

Thanks,

Kate Johansen  
Manager, Health and Transportation Policy  
Minnesota Chamber of Commerce  
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MINNESOTA  
CHAMBER *of*  
COMMERCE

September 26, 2012

Health Insurance Exchange Advisory Task Force  
Department of Commerce  
85 Seventh Place East  
Saint Paul, Minnesota 55101

Dear Health Insurance Exchange Advisory Task Force:

The Minnesota Chamber of Commerce appreciates the opportunity to provide the following comments in response to the Small employer Technical Work Group's Recommendation to the Health Insurance Exchange Advisory Task Force. The Chamber represents 2200 businesses throughout the state, 80 percent of which are small businesses eligible for exchange participation. Accordingly, the exchange's treatment of small business is deeply important to the Chamber and its members.

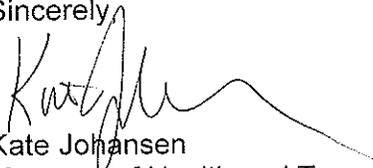
The Chamber appreciates this work group's focus on the concern regarding premium costs shared by many small employers. The Chamber supports the recommendation that a state exchange should include information about tax savings for small employers and credits available to them through the exchange. The Chamber also supports the recommendation that the exchange should provide tax savings and credit information to employers via outreach, education, and marketing. The Chamber respectfully suggests the information provided to small employers might also include information on how their employees' use of exchange subsidies may impact them with respect to potential tax penalties and offer any information on how employers may communicate with the exchange to determine whether their employees are utilizing those credits. Finally, the Chamber agrees with the work group's recommendation to embed exchange operations and technology and platforms in mechanisms to facilitate small employer participation in tax-preferred vehicles.

Overall, the Chamber generally supports the recommendations of the small employer technical work group. As the Task Force advances in its policy work, the Chamber looks forward to providing additional input on small employers' expectations for the exchange and how it should be designed to advance small employer objectives of controlling costs, communicating effectively regarding federal and state legal requirements, and providing balanced information

necessary to determine whether a small employer wants to purchase coverage via the exchange.

Thanks to the work group for its efforts and to the Task Force for its consideration of these comments.

Sincerely,



Kate Johansen  
Manager of Health and Transportation Policy