

From: George Curt
Sent: Wednesday, May 21, 2014 3:39 PM
To: Sawicki, Marlene
Subject: Public Comment Period - SHOP Employee Choice for NH in 2015

Hello Marlene,

Thank you for the opportunity to make comment on this issue. I am a health insurance producer in Sullivan County. I serve over 1000 individuals and over 100 small businesses in this area and have done so for over 20 years. After the problems and chaotic situation over the last year with the implementation of the ACA and more importantly the FFM, **I strongly urge that additional functionality on any level be postponed.** As you may be aware, the FFM is not even fully functioning at this time as it was intended for individuals OR small businesses. The existing SHOP does not even enroll employees today with only one plan. The carriers are handling the actual enrollment. The ACA brought a huge burden on the health insurance industry for sure, but on a state and local level, it is causing a large disruption to the day to day function of my business and that of my small business owner clients. It has been problematic to provide the necessary education and information to them for all of the new regulations and costs we are already dealing with. The efficiency of small businesses in NH has been greatly affected. I am certain that the combination of cost and time spent is having a negative effect on the NH economy. In NH we also have the issue of bringing new carriers into the equation. As I stated above, the FFM is not functioning with only one carrier. How will it function well with 2 or hopefully 3 carriers in 2015? Just adding carriers without the employee choice will be an issue. From a purely insurance underwriting perspective, I certainly also have concerns. Adverse selection will be an issue and carriers will be forced to be more conservative. Small business owners cannot afford all of this chaos, regulation and uncertainty in addition to even higher rates. As stated in the Commissioner Bulletin, "due to technical constraints, the employee functionality was not available in 2014 in the SHOP". I submit that until the existing functions are completely functional for a period of time and the health insurance industry can come to grips on where we are, **adding employee choice would be an even larger burden.**

Again, I thank you for allowing me to offer my opinion.

Regards,
George

George G. Curt, CLU, ChFC, CIC
Life, Health, Disability and Long Term Care Insurance
The Insurance Center Inc.
P.O. Box 885
Claremont, NH 03743