



# New Hampshire Citizens Alliance

*Over thirty-five years working for social, economic, and political justice for all*

Via Email: [Marlene.Sawicki@ins.nh.gov](mailto:Marlene.Sawicki@ins.nh.gov)

Commissioner Roger Sevigny  
NH Insurance Department  
21 S. Fruit Street, Suite 14  
Concord, NH 03301

Dear Commissioner Sevigny,

Thank you for the opportunity to provide input regarding the option for New Hampshire to request a delay in the implementation of employee choice in the SHOP Marketplace.

NH Citizens Alliance is a 35 year old, NH based non-profit organization providing education and alerting our members to advocacy opportunities as we work on issues of social, economic, racial and political justice. With nearly 20,000 members we have appreciated the opportunities for advocacy, such as this, which has been provided as NH has moved forward with the implementation of the Affordable Care Act.

NHCA believes that it is essential that the full implementation of the S.H.O.P move forward as quickly as is reasonably possible. We understand that you are under an urgent timeline for your decision and we commend you for enabling and prioritizing a public comment opportunity prior to deciding how to proceed.

Given the dominance of small business employers in NH, clearly the full implementation of the SHOP for Granite State businesses is critical as it is an importance means for the residents of NH to gain health insurance coverage, therefore gaining quality affordable healthcare. There is, of course the added benefit of the tax credit to our small businesses that will purchase through the SHOP.

While NHCA understands that this is a difficult decision for which there is not a clear roadmap, we believe that a delay should only be requested if it was clearly necessary and sufficient for smooth implementation of employee choice.

NHCA has approximately 1000 NH small businesses in our business advocacy network. As much as possible we seek input from these businesses and believe that the benefit of SHOP implementation in 2015 is equally weighed against the potential benefits of delaying implementation for a year.

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Small employers in NH have previously expressed the desire for employee choice. Many of our small businesses, such as Checkmate Payroll Services, testified at the public hearing in 2013 to that effect. Our business owners do not want to delve into the lives of their employees in order to make the best choice for the majority of their employees. Nor does this lack of employee choice provide for the level playing field against large businesses, which is the hope and promise of the SHOP.

While we received notice of this request for input just a few days ago, NHCA did notify our business members about this opportunity and hope that you have received emails from many of them. To assist them with input we distributed a brief survey that has also been sent to Ms Sawicki's email address along with the replies of those who responded. However, this is a complex issue and we trust that you are mindful that many businesses, individuals and organizations may feel limited in understanding these complexities even if they believe in the basic concept that employee choice, as soon as is reasonably possible, is preferred.

We thank you for your serious consideration of these comments as you move forward with your decisions. If we can be of assistance in any way, please don't hesitate to contact us.

Sincerely,

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