

# canys

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August 24, 2012

Danielle Holahan  
Project Director  
Health Benefit Exchange Planning

Dear Danielle:

The Chamber Alliance of New York State (CANYS) represents a network of chambers of commerce servicing 110,000 businesses-representing 3.6 million employees on a daily basis. Chambers and Manufacturers Associations have decades of experience providing insurance education and helping businesses and their employees navigate insurance plans that best fit their needs. We offer the following comments on the Essential Health Benefit proposal.

As we reviewed the ten plans we have concerns that these plans are not reflective of the diverse regions of the State. Plan choices should ultimately be left to each region.

In addition, we are concerned with affordability and believe that the State should request a waiver from the Federal government to offer a catastrophic plan that meets the minimum requirements of the Affordable Care Act. Employees are looking for high deductible, catastrophic plan options, particularly with the advent of Health Savings Accounts and increased prominence of defined contribution models. This option would be more attractive to small businesses which would encourage participation in the exchange.

Thank you for the opportunity to provide comment. We look forward to working with you in order to accomplish the Governor's goal of reducing health insurance costs for the businesses and residents of New Yorkers.

Sincerely,



Charles R. Steiner  
Chair