
Karen and Dawn,

Thank you Karen for continuing to include me on the emails for this meeting. I listened in on the counting part today and if you don't mind, I'd like to offer a few comments: My first comment is **simplicity**. The group profile form:

- Should be used for one purpose, and one purpose only. It should be used to determine group size. That's it....
- The State should create the form and EVERY carrier MUST use the form. They cannot alter it or put their logo on it.
- The counting should be the same inside and outside the exchange
- Definition of employee, for counting purposes, should also be the same for all carriers

Someone talked about HIPAA counting using bodies and the IRS counts using FTE. These 2 methods can result in different answers. That is why it's critical that the counting be the same inside and outside the exchange.

The ACA states that we don't have to include seasonal employees in the count. Seasonal employees are those who work less than 120 days a year. We're done, don't count them. make it simple across the board. We are looking at the prior calendar year so it shouldn't be too hard.

The ACA also refers to the prior calendar year for counting group size. That **MUST** be the same across the board. PERIOD!! Dawn mentioned during the meeting that Providence's form was vague, but the other form stated prior calendar year. **THE ANSWER TO THAT QUESTION SHOULD ALWAYS BE THE SAME NO MATTER WHICH CARRIER ASKS IT.** Therefore, the form needs to be standardized WITHOUT allowing the carriers to make any changes. If the carrier needs additional information, they can create their own separate form.

The ACA is extremely confusing. The people of Oregon (and probably the USA) want it simplified!!!! This is an excellent opportunity here to do just that.

I understand Anthony wants to make sure and adhere to the law, HB 2466 and if it will be pre-empted, but I think they should work towards simplification and ease. Make something easier for the carrier, the employer and the agent. **WE WILL ALL BE THANKFUL!**

I wouldn't mind attending that meeting on Monday if it's ok.

Thank you...

Kathy Gadinis


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