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Sent: Tuesday, September 08, 2015 10:19 PM

To: WOODS Gayle * DCBS; WINKEL Karen J * DCBS

Cc: HOLMAN Jeannette * DCBS; SAMPLE Tashia M * DCBS

Subject: RE: Healthcare Reform Rulemaking Advisory Committee

All, thanks for the opportunity to comment. Here are a few suggestions:

- Include a definition of small employer so that the defining parameters are clear. This should specify not just that a that a small employer have had 1-100 employees on average during the preceding calendar year but also that the employer have at least one employee on the first day of the plan year, which is consistent with the federal definitions.
- State that when counting employees to determine group size, we should not count temporary, seasonal, leased, contracted or retired employees or former employees on continuation coverage.
- As for the required elements on the profile form, I would have carriers collect the following information:
 - o Full time employee count – meaning those working 30 or more hours per week on average during the preceding calendar year;
 - o Full Time Equivalent (FTE) count – meaning, on average during the preceding calendar year, the total hours worked per week by all employees working less than 30 hours, and divide by 30;
 - o Number of employees as of the effective date of coverage

Thanks,

Dave