

From: Keels, Lisa (HHS/OCIIO)
Sent: Wednesday, December 01, 2010 12:34 PM
To: Doug Crowell
Cc: Habit, Sandra (HHS/OCIIO)
Subject: RE: Follow up to your voice message pertaining to CPC Logistics Waiver
Hello Doug,

Your waiver has been granted. You should be receiving a formal confirmation (via an emailed letter) within the next few days.

Thank you,
Lisa

From: Doug Crowell [mailto:d.crowell@callcpc.com]
Sent: Wednesday, December 01, 2010 11:16 AM
To: Keels, Lisa (HHS/OCIIO)
Subject: Re: Follow up to your voice message pertaining to CPC Logistics Waiver

Lisa

Thank you for the quick reply. Can you tell me if our waiver has been granted? I have open enrollment starting soon.

Thank you
Doug Crowell
Sent from my Blackberry!

From: Keels, Lisa (HHS/OCIIO)
To: Doug Crowell
Cc: Habit, Sandra (HHS/OCIIO)
Sent: Wed Dec 01 09:45:11 2010
Subject: RE: Follow up to your voice message pertaining to CPC Logistics Waiver
Good morning, Doug,

Thank you for checking in. I will let you know if we have any questions, but at this time, your application is complete.

Thank you again,
Lisa

From: Doug Crowell [mailto:d.crowell@callcpc.com]
Sent: Wednesday, December 01, 2010 10:23 AM
To: Keels, Lisa (HHS/OCIIO)
Subject: Re: Follow up to your voice message pertaining to CPC Logistics Waiver

Good morning Lisa

I am just following up on the status of our Waiver with your agency and to see if you need any additional information. I am out of the office and traveling on business and have my Blackberry with me.

Thank you
Doug Crowell
Sent from my Blackberry!

From: Keels, Lisa (HHS/OCIIO)
To: Doug Crowell

CPC LOGIST:000001

Cc: Habit, Sandra (HHS/OCIIO)

Sent: Mon Nov 29 09:05:20 2010

Subject: RE: Follow up to your voice message pertaining to CPC Logistics Waiver

Thank you, Doug. I will let you know if we have any more questions. I hope you enjoyed your Thanksgiving as well.

Thank you again,

Lisa

From: Doug Crowell [mailto:d.crowell@callcpc.com]

Sent: Wednesday, November 24, 2010 12:54 PM

To: Keels, Lisa (HHS/OCIIO)

Cc: Habit, Sandra (HHS/OCIIO)

Subject: RE: Follow up to your voice message pertaining to CPC Logistics Waiver

Importance: High

Good Morning Lisa

Thank you once again for taking the time this morning and discussing the questions you have with respect to our companies application for a Waiver from the Department of Health and Human Services with respect to the annual limit. I have provided my answers and relevant information below each question you have asked.

-
As I mentioned to you on the phone, I will be traveling Friday of this week as well as all of next week. In the event you, your supervisor and the reviewer of this application has any further questions please do not hesitate to contact me on my cell phone. My cell phone number is 314-330-8938.

Thank you for considering our application and have a good Thanksgiving day.

Doug

From: Keels, Lisa (HHS/OCIIO) [mailto:Lisa.Keels@hhs.gov]

Sent: Wednesday, November 24, 2010 9:30 AM

To: Doug Crowell

Cc: Habit, Sandra (HHS/OCIIO)

Subject: RE: Follow up to your voice message pertaining to CPC Logistics Waiver

Hello Doug,

Thank you for speaking with me this morning and for your application for the Waiver of the Annual Limits Requirements of the PHS Act Section 2711. As we discussed, in order to complete your application, please provide the following information:

- Please confirm that you are seeking a waiver for the following plans: Plan 100, EPO Plan, Plan 600, and Plan 603 (the non-Massachusetts plans).
Answer: Yes this correct we are seeking the waiver for all Plans with the exception of those employees covered under the Massachusetts plan which has (b)(4) plan participants.
- In your application, you state that (b)(4) individuals are covered by the Plan. Please provide the number of individuals covered by each plan (i.e., Plan 100, Plan, Plan 600, and Plan 603).
Answer: Plan 100 has (b)(4) plan participants, Plan HMO-EPO has (b)(4) plan participants, Plan 600 as (b)(4) plan participants and Plan 603 has (b)(4) plan participants
- Please confirm whether the plans are limited benefit or comprehensive plans.

CPC LOGIST:000002

Answer: All of our plans are full medical comprehensive plans with a annual limit as specified in t cuments which were submitted. (Plan 100 has a (b)(4) limit, Plan EPO, Plan 600 and Plan 603 all have a (b)(4) annual limit.

- Please state whether these plans are grandfathered plans.

Answer: Providing the waiver is obtained the plans will remain grandfathered. Otherwise the company will have to make plan changes and increase in the employee share of the premium greater than the (b)(4) increase limit and thus will result in the Plans to lose Grandfather status.

- Please confirm that you plan to remove the lifetime limits on all the plans, in order to be in compliance with the Affordable Care Act.

Answer: Yes, the plans will have no life time limit effective January 1, 2011 as to be in compliance with the Affordable Care Act.

- For each plan, please provide the current monthly premium rates and the projected monthly premium rates applicable to the plan if the plan were to comply with the restricted annual benefits. In other words, we would like a chart that reflects the following information: Response: Please note that if the waiver is not obtained substantial changes, modifications and benefit reduction to the plans will have to be made as specified in our original letter to HHS dated October 29, 2010. In addition to decreasing benefits, premiums will have to be increased above and beyond the estimated inflationary cost of medical insurance to the plan participants. I have indicated below the standard premiums as requested for each plan.

Plan 100	2010 January Premium (current level)	2011 January Premium (renewal)	2011 January Premium (if \$750,000 annual limit was applied)
EE			
EE + Child (if applicable or other appropriate tier)			
EE + Spouse (if applicable or other appropriate tier)		(b)(4)	
Family (if applicable or other appropriate tier)			

Plan HMO/EPO	2010 January Premium (current level)	2011 January Premium (renewal)	2011 January Premium (if \$750,000 annual limit was applied)
EE			
EE + Child (if applicable or other appropriate tier)			
EE + Spouse (if applicable or other appropriate tier)		(b)(4)	
Family (if applicable or other appropriate tier)			

other appropriate tier)			
-------------------------	--	--	--

Plan 600	2010 January Premium (current level)	2011 January Premium (renewal)	2011 January Premium (if \$750,000 annual limit was applied)
EE	(b)(4)		
EE + Child (if applicable or other appropriate tier)			
EE + Spouse (if applicable or other appropriate tier)			
Family (if applicable or other appropriate tier)			

Plan 603	2010 January Premium (current level)	2011 January Premium (renewal)	2011 January Premium (if \$750,000 annual limit was applied)
EE	(b)(4)		
EE + Child (if applicable or other appropriate tier)			
EE + Spouse (if applicable or other appropriate tier)			
Family (if applicable or other appropriate tier)			

In order to complete your application, please provide this information as soon as possible, preferably today. We look forward to receiving your completed application.

Thank you,
Lisa Keels

From: Doug Crowell [mailto:d.crowell@callcpc.com]
Sent: Wednesday, November 24, 2010 8:31 AM
To: Keels, Lisa (HHS/OC110)
Subject: Follow up to your voice message pertaining to CPC Logistics Waiver
Importance: High

Good morning Lisa

I just walked into the office and retrieved your voice message from yesterday afternoon. I apologize for not getting back to you yesterday but I was at a tax law seminar for the past several days and unfortunately I left my phone charge back in the office and my battery on my blackberry was out of charge so I could not call in and check my messages. I am in the office this

CPC LOGIST:000004

morning and would like to the opportunity to discuss with you any questions you may have with respect to our waiver request from the increase of the annual limit.

We have a skeleton office support staff today and I know your time is important and in the event I step away from my desk I don't want to miss your phone call. Therefore, so I don't miss your call I will carry my cell phone with me today and it is convenient for you to call me today, then please call me on my cell phone number so we can discuss your questions. My cell phone number and email address is as follows:

314-330-8938

d.crowell@callcpc.com.

Thank you for your phone call yesterday and I am looking forward in speaking with you. If for some reason we do not connect today as indicated by your voice mail that you will be working remote today I wish you and your family a Happy Thanksgiving. I am traveling all of next week and will have my laptop and Blackberry with me, and yes I will make sure this time I pack my phone charger.

Take care and will speak with you soon.

Doug Crowell, CFO

From: Keels, Lisa (HHS/OCIIO)
Sent: Wednesday, December 01, 2010 1:16 PM
To: Habit, Sandra (HHS/OCIIO)
Subject: FW: Follow up to your voice message pertaining to CPC Logistics Waiver
Hi Sandy,

Another email for the G Drive. Thanks!

Lisa

From: Doug Crowell [mailto:d.crowell@callcpc.com]
Sent: Wednesday, December 01, 2010 12:55 PM
To: Keels, Lisa (HHS/OCIIO)
Subject: Re: Follow up to your voice message pertaining to CPC Logistics Waiver

Lisa

Thank you for the follow up. Greatly appreciated
Doug Crowell
Sent from my Blackberry!

From: Keels, Lisa (HHS/OCIIO)
To: Doug Crowell
Cc: Habit, Sandra (HHS/OCIIO)
Sent: Wed Dec 01 11:33:39 2010
Subject: RE: Follow up to your voice message pertaining to CPC Logistics Waiver
Hello Doug,

Your waiver has been granted. You should be receiving a formal confirmation (via an emailed letter) within the next few days.

Thank you,
Lisa

From: Doug Crowell [mailto:d.crowell@callcpc.com]
Sent: Wednesday, December 01, 2010 11:16 AM
To: Keels, Lisa (HHS/OCIIO)
Subject: Re: Follow up to your voice message pertaining to CPC Logistics Waiver

Lisa

Thank you for the quick reply. Can you tell me if our waiver has been granted? I have open enrollment starting soon.

Thank you
Doug Crowell
Sent from my Blackberry!

From: Keels, Lisa (HHS/OCIIO)
To: Doug Crowell
Cc: Habit, Sandra (HHS/OCIIO)
Sent: Wed Dec 01 09:45:11 2010
Subject: RE: Follow up to your voice message pertaining to CPC Logistics Waiver
Good morning, Doug,

CPC LOGIST:000006

Thank you for checking in. I will let you know if we have any questions, but at this time, your application is complete.

Thank you again,
Lisa

From: Doug Crowell [mailto:d.crowell@callcpc.com]
Sent: Wednesday, December 01, 2010 10:23 AM
To: Keels, Lisa (HHS/OCIIO)
Subject: Re: Follow up to your voice message pertaining to CPC Logistics Waiver

Good morning Lisa

I am just following up on the status of our Waiver with your agency and to see if you need any additional information. I am out of the office and traveling on business and have my Blackberry with me.

Thank you
Doug Crowell
Sent from my Blackberry!

From: Keels, Lisa (HHS/OCIIO)
To: Doug Crowell
Cc: Habit, Sandra (HHS/OCIIO)
Sent: Mon Nov 29 09:05:20 2010
Subject: RE: Follow up to your voice message pertaining to CPC Logistics Waiver

Thank you, Doug. I will let you know if we have any more questions. I hope you enjoyed your Thanksgiving as well.

Thank you again,
Lisa

From: Doug Crowell [mailto:d.crowell@callcpc.com]
Sent: Wednesday, November 24, 2010 12:54 PM
To: Keels, Lisa (HHS/OCIIO)
Cc: Habit, Sandra (HHS/OCIIO)
Subject: RE: Follow up to your voice message pertaining to CPC Logistics Waiver
Importance: High

Good Morning Lisa

Thank you once again for taking the time this morning and discussing the questions you have with respect to our companies application for a Waiver from the Department of Health and Human Services with respect to the annual limit. [I have provided my answers and relevant information below each question you have asked.](#)

-
As I mentioned to you on the phone, I will be traveling Friday of this week as well as all of next week. In the event you, your supervisor and the reviewer of this application has any further questions please do not hesitate to contact me on my cell phone. My cell phone number is 314-330-8938.

Thank you for considering our application and have a good Thanksgiving day.

Doug

From: Keels, Lisa (HHS/OCIIO) [mailto:Lisa.Keels@hhs.gov]
Sent: Wednesday, November 24, 2010 9:30 AM
To: Doug Crowell

CPC LOGIST:000007

Cc: Habit, Sandra (HHS/OCIHO)

Subject: RE: Follow up to your voice message pertaining to CPC Logistics Waiver

Hello Doug,

Thank you for speaking with me this morning and for your application for the Waiver of the Annual Limits Requirements of the PHS Act Section 2711. As we discussed, in order to complete your application, please provide the following information:

- Please confirm that you are seeking a waiver for the following plans: Plan 100, EPO Plan, Plan 600, and Plan 603 (the non-Massachusetts plans).

Answer: Yes this correct we are seeking the waiver for all Plans with the exception of those employees covered under the Massachusetts plan which has (b)(4) plan participants.

- In your application, you state that (b)(4) individuals are covered by the Plan. Please provide the number of individuals covered by each plan (, Plan 100, EPO Plan, Plan 600, and PI).

Answer: Plan 100 has (b)(4) plan participants, Plan HMO-EPO has (b)(4) plan participants, Plan 600 as (b)(4) plan participants and Plan 603 has (b)(4) plan participants

- Please confirm whether the plans are limited benefit or comprehensive plans.

Answer: All of our plans are full medical comprehensive plans with a annual limit as specified in t cuments which were submitted. (Plan 100 has a (b)(4) limit, Plan EPO, Plan 600 and Plan 603 all have a (b)(4) annual limit.

- Please state whether these plans are grandfathered plans.

Answer: Providing the waiver is obtained the plans will remain grandfathered. Otherwise the company will have to make plan changes and increase in the employee share of the premium greater than the 5% increase limit and thus will result in the Plans to lose Grandfather status.

- Please confirm that you plan to remove the lifetime limits on all the plans, in order to be in compliance with the Affordable Care Act.

Answer: Yes, the plans will have no life time limit effective January 1, 2011 as to be in compliance with the Affordable Care Act.

- For each plan, please provide the current monthly premium rates and the projected monthly premium rates applicable to the plan if the plan were to comply with the restricted annual benefits. In other words, we would like a chart that reflects the following information: Response: Please note that if the waiver is not obtained substantial changes, modifications and benefit reduction to the plans will have to be made as specified in our original letter to HHS dated October 29, 2010. In addition to decreasing benefits, premiums will have to be increased above and beyond the estimated inflationary cost of medical insurance to the plan participants. I have indicated below the standard premiums as requested for each plan.

Plan 100	2010 January Premium (current level)	2011 January Premium (renewal)	2011 January Premium (if \$750,000 annual limit was applied)
EE EE + Child (if applicable or other appropriate tier) EE + Spouse (if		(b)(4)	

CPC LOGIST:000008

applicable or other appropriate tier)			
Family (if applicable or other appropriate tier)	(b)(4)		

Plan HMO/EPO	2010 January Premium (current level)	2011 January Premium (renewal)	2011 January Premium (if \$750,000 annual limit was applied)
EE	(b)(4)		
EE + Child (if applicable or other appropriate tier)			
EE + Spouse (if applicable or other appropriate tier)			
Family (if applicable or other appropriate tier)			

Plan 600	2010 January Premium (current level)	2011 January Premium (renewal)	2011 January Premium (if \$750,000 annual limit was applied)
EE	(b)(4)		
EE + Child (if applicable or other appropriate tier)			
EE + Spouse (if applicable or other appropriate tier)			
Family (if applicable or other appropriate tier)			

Plan 603	2010 January Premium (current level)	2011 January Premium (renewal)	2011 January Premium (if \$750,000 annual limit was applied)
EE	(b)(4)		
EE + Child (if applicable or other appropriate tier)			
EE + Spouse (if applicable or other appropriate tier)			
Family (if applicable or other appropriate tier)			

In order to complete your application, please provide this information as soon as possible, preferably today. We look forward to receiving your completed application.

Thank you,
Lisa Keels

From: Doug Crowell [mailto:d.crowell@callcpc.com]
Sent: Wednesday, November 24, 2010 8:31 AM
To: Keels, Lisa (HHS/OC110)
Subject: Follow up to your voice message pertaining to CPC Logistics Waiver
Importance: High

Good morning Lisa

I just walked into the office and retrieved your voice message from yesterday afternoon. I apologize for not getting back to you yesterday but I was at a tax law seminar for the past several days and unfortunately I left my phone charge back in the office and my battery on my blackberry was out of charge so I could not call in and check my messages. I am in the office this morning and would like to the opportunity to discuss with you any questions you may have with respect to our waiver request from the increase of the annual limit.

We have a skeleton office support staff today and I know your time is important and in the event I step away from my desk I don't want to miss your phone call. Therefore, so I don't miss your call I will carry my cell phone with me today and it is convenient for you to call me today, then please call me on my cell phone number so we can discuss your questions. My cell phone number and email address is as follows:

314-330-8938
d.crowell@callcpc.com.

Thank you for your phone call yesterday and I am looking forward in speaking with you. If for some reason we do not connect today as indicated by your voice mail that you will be working remote today I wish you and your family a Happy Thanksgiving. I am traveling all of next week and will have my laptop and Blackberry with me, and yes I will make sure this time I pack my phone charger.

Take care and will speak with you soon.

Doug Crowell, CFO

CPC LOGIST:000010

From: Botwinick, Alexandra (HHS/OCIO)
Sent: Monday, December 06, 2010 8:42 AM
To: 'd.crowell@callcpc.com'
Subject: Waiver of the Annual Limits Requirements of PHS Act Section 2711

Importance: High

Attachments: Updated Jan 1 Approval Letter .pdf
Good Morning,

Thank you for submitting an application for a Waiver of the Annual Limits Requirements of the PHS Act Section 2711 for **CPC Logistics Health & Welfare Plan**. HHS has reviewed your application and made its determination. Please see the attached letter.

Please confirm receipt of this letter by replying to this e-mail address with a copy to OCIOOversight@hhs.gov.

Please let me know if I can be of further assistance.

Sincerely,

Alexandra Botwinick

Office of Oversight
HHS/OCIO
alexandra.botwinick@hhs.gov

CPC LOGIST:000011

From: Keels, Lisa (HHS/OCIIO)
Sent: Monday, November 29, 2010 10:05 AM
To: Doug Crowell
Cc: Habit, Sandra (HHS/OCIIO)
Subject: RE: Follow up to your voice message pertaining to CPC Logistics Waiver

Thank you, Doug. I will let you know if we have any more questions. I hope you enjoyed your Thanksgiving as well.

Thank you again,

Lisa

From: Doug Crowell [mailto:d.crowell@callcpc.com]
Sent: Wednesday, November 24, 2010 12:54 PM
To: Keels, Lisa (HHS/OCIIO)
Cc: Habit, Sandra (HHS/OCIIO)
Subject: RE: Follow up to your voice message pertaining to CPC Logistics Waiver
Importance: High

Good Morning Lisa

Thank you once again for taking the time this morning and discussing the questions you have with respect to our companies application for a Waiver from the Department of Health and Human Services with respect to the annual limit. I have provided my answers and relevant information below each question you have asked.

-
As I mentioned to you on the phone, I will be traveling Friday of this week as well as all of next week. In the event you, your supervisor and the reviewer of this application has any further questions please do not hesitate to contact me on my cell phone. My cell phone number is 314-330-8938.

Thank you for considering our application and have a good Thanksgiving day.

Doug

From: Keels, Lisa (HHS/OCIIO) [mailto:Lisa.Keels@hhs.gov]
Sent: Wednesday, November 24, 2010 9:30 AM
To: Doug Crowell
Cc: Habit, Sandra (HHS/OCIIO)
Subject: RE: Follow up to your voice message pertaining to CPC Logistics Waiver

Hello Doug,

Thank you for speaking with me this morning and for your application for the Waiver of the Annual Limits Requirements of the PHS Act Section 2711. As we discussed, in order to complete your application, please provide the following information:

- Please confirm that you are seeking a waiver for the following plans: Plan 100, EPO Plan, Plan 600, and Plan 603 (the non-Massachusetts plans).
Answer: Yes this correct we are seeking the waiver for all Plans with the exception of those employees covered under the Massachusetts plan which has (b)(4) plan participants.
- In your application, you state that (b)(4) individuals are covered by the Plan. Please provide the number of individuals covered by each plan (i.e., Plan 100, EPO Plan, Plan 600, and Plan 603).
Answer: Plan 100 has (b)(4) plan participants, Plan HMO-EPO has (b)(4) plan participants, Plan 600 as (b)(4) plan participants and Plan 603 has (b)(4) plan participants

CPC LOGIST:000012

- Please confirm whether the plans are limited benefit or comprehensive plans.

Answer: All of our plans are full medical comprehensive plans with a annual limit as specified in the plan documents which were submitted. (Plan 100 has a (b)(4) limit, Plan EPO, Plan 600 and Plan 603 all have a (b)(4) annual limit.

- Please state whether these plans are grandfathered plans.

Answer: Providing the waiver is obtained the plans will remain grandfathered. Otherwise the company will have to make plan changes and increase in the employee share of the premium greater than the (b)(4) increase limit and thus will result in the Plans to lose Grandfather status.

- Please confirm that you plan to remove the lifetime limits on all the plans, in order to be in compliance with the Affordable Care Act.

Answer: Yes, the plans will have no life time limit effective January 1, 2011 as to be in compliance with the Affordable Care Act.

- For each plan, please provide the current monthly premium rates and the projected monthly premium rates applicable to the plan if the plan were to comply with the restricted annual benefits. In other words, we would like a chart that reflects the following information: Response: Please note that if the waiver is not obtained substantial changes, modifications and benefit reduction to the plans will have to be made as specified in our original letter to HHS dated October 29, 2010. In addition to decreasing benefits, premiums will have to be increased above and beyond the estimated inflationary cost of medical insurance to the plan participants. I have indicated below the standard premiums as requested for each plan.

Plan 100	2010 January Premium (current level)	2011 January Premium (renewal)	2011 January Premium (if \$750,000 annual limit was applied)
EE			
EE + Child (if applicable or other appropriate tier)		(b)(4)	
EE + Spouse (if applicable or other appropriate tier)			
Family (if applicable or other appropriate tier)			

Plan HMO/EPO	2010 January Premium (current level)	2011 January Premium (renewal)	2011 January Premium (if \$750,000 annual limit was applied)
EE			
EE + Child (if applicable or other appropriate tier)		(b)(4)	
EE + Spouse (if applicable or other appropriate tier)			

CPC LOGIST:000013

appropriate tier) Family (if applicable or other appropriate tier)	(b)(4)
--	--------

Plan 600	2010 January Premium (current level)	2011 January Premium (renewal)	2011 January Premium (if \$750,000 annual limit was applied)
EE	(b)(4)		
EE + Child (if applicable or other appropriate tier)			
EE + Spouse (if applicable or other appropriate tier)			
Family (if applicable or other appropriate tier)			

Plan 603	2010 January Premium (current level)	2011 January Premium (renewal)	2011 January Premium (if \$750,000 annual limit was applied)
EE	(b)(4)		
EE + Child (if applicable or other appropriate tier)			
EE + Spouse (if applicable or other appropriate tier)			
Family (if applicable or other appropriate tier)			

In order to complete your application, please provide this information as soon as possible, preferably today. We look forward to receiving your completed application.

Thank you,
Lisa Keels

From: Doug Crowell [mailto:d.crowell@callcpc.com]
Sent: Wednesday, November 24, 2010 8:31 AM
To: Keels, Lisa (HHS/OCIIO)
Subject: Follow up to your voice message pertaining to CPC Logistics Waiver
Importance: High

Good morning Lisa

I just walked into the office and retrieved your voice message from yesterday afternoon. I apologize for not getting back to you

CPC LOGIST:000014

yesterday but I was at a tax law seminar for the past several days and unfortunately I left my phone charge back in the office and my battery on my blackberry was out of charge so I could not call in and check my messages. I am in the office this morning and would like to the opportunity to discuss with you any questions you may have with respect to our waiver request from the increase of the annual limit.

We have a skeleton office support staff today and I know your time is important and in the event I step away from my desk I don't want to miss your phone call. Therefore, so I don't miss your call I will carry my cell phone with me today and it is convenient for you to call me today, then please call me on my cell phone number so we can discuss your questions. My cell phone number and email address is as follows:

314-330-8938

d.crowell@callcpc.com.

Thank you for your phone call yesterday and I am looking forward in speaking with you. If for some reason we do not connect today as indicated by your voice mail that you will be working remote today I wish you and your family a Happy Thanksgiving. I am traveling all of next week and will have my laptop and Blackberry with me, and yes I will make sure this time I pack my phone charger.

Take care and will speak with you soon.

Doug Crowell, CFO

From: Keels, Lisa (HHS/OCIIO)
Sent: Wednesday, December 01, 2010 10:45 AM
To: Doug Crowell
Cc: Habit, Sandra (HHS/OCIIO)
Subject: RE: Follow up to your voice message pertaining to CPC Logistics Waiver
Good morning, Doug,

Thank you for checking in. I will let you know if we have any questions, but at this time, your application is complete.

Thank you again,
Lisa

From: Doug Crowell [mailto:d.crowell@callcpc.com]
Sent: Wednesday, December 01, 2010 10:23 AM
To: Keels, Lisa (HHS/OCIIO)
Subject: Re: Follow up to your voice message pertaining to CPC Logistics Waiver

Good morning Lisa

I am just following up on the status of our Waiver with your agency and to see if you need any additional information. I am out of the office and traveling on business and have my Blackberry with me.

Thank you
Doug Crowell
Sent from my Blackberry!

From: Keels, Lisa (HHS/OCIIO)
To: Doug Crowell
Cc: Habit, Sandra (HHS/OCIIO)
Sent: Mon Nov 29 09:05:20 2010
Subject: RE: Follow up to your voice message pertaining to CPC Logistics Waiver
Thank you, Doug. I will let you know if we have any more questions. I hope you enjoyed your Thanksgiving as well.

Thank you again,
Lisa

From: Doug Crowell [mailto:d.crowell@callcpc.com]
Sent: Wednesday, November 24, 2010 12:54 PM
To: Keels, Lisa (HHS/OCIIO)
Cc: Habit, Sandra (HHS/OCIIO)
Subject: RE: Follow up to your voice message pertaining to CPC Logistics Waiver
Importance: High

Good Morning Lisa

Thank you once again for taking the time this morning and discussing the questions you have with respect to our companies application for a Waiver from the Department of Health and Human Services with respect to the annual limit. [I have provided my answers and relevant information below each question you have asked.](#)

-
As I mentioned to you on the phone, I will be traveling Friday of this week as well as all of next week. In the event you, your supervisor and the reviewer of this application has any further questions please do not hesitate to contact me on my cell phone. My cell phone number is 314-330-8938.

CPC LOGIST:000016

Thank you for considering our application and have a good Thanksgiving day.

Doug

From: Keels, Lisa (HHS/OCIIO) [mailto:Lisa.Keels@hhs.gov]
Sent: Wednesday, November 24, 2010 9:30 AM
To: Doug Crowell
Cc: Habit, Sandra (HHS/OCIIO)
Subject: RE: Follow up to your voice message pertaining to CPC Logistics Waiver

Hello Doug,

Thank you for speaking with me this morning and for your application for the Waiver of the Annual Limits Requirements of the PHS Act Section 2711. As we discussed, in order to complete your application, please provide the following information:

- Please confirm that you are seeking a waiver for the following plans: Plan 100, EPO Plan, Plan 600, and Plan 603 (the non-Massachusetts plans).
Answer: Yes this correct we are seeking the waiver for all Plans with the exception of those employees covered under the Massachusetts plan which has (b)(4) plan participants.
- In your application, you state that (b)(4) individuals are covered by the Plan. Please provide the number of individuals covered by each plan (i.e., Plan 100, EPO Plan, Plan 600, and Plan 603).
Answer: Plan 100 has (b)(4) plan participants, Plan HMO-EPO has (b)(4) plan participants, Plan 600 as (b)(4) plan participants and Plan 603 has (b)(4) plan participants
- Please confirm whether the plans are limited benefit or comprehensive plans.
Answer: All of our plans are full medical comprehensive plans with a annual limit as specified in the plan documents which were submitted. (Plan 100 has a (b)(4) limit, Plan EPO, Plan 600 and Plan 603 all have a (b)(4) annual limit.
- Please state whether these plans are grandfathered plans.
Answer: Providing the waiver is obtained the plans will remain grandfathered. Otherwise the company will have to make plan changes and increase in the employee share of the premium greater than the (b)(4) increase limit and thus will result in the Plans to lose Grandfather status.
- Please confirm that you plan to remove the lifetime limits on all the plans, in order to be in compliance with the Affordable Care Act.
Answer: Yes, the plans will have no life time limit effective January 1, 2011 as to be in compliance with the Affordable Care Act.
- For each plan, please provide the current monthly premium rates and the projected monthly premium rates applicable to the plan if the plan were to comply with the restricted annual benefits. In other words, we would like a chart that reflects the following information: Response: Please note that if the waiver is not obtained substantial changes, modifications and benefit reduction to the plans will have to be made as specified in our original letter to HHS dated October 29, 2010. In addition to decreasing benefits, premiums will have to be increased above and beyond the estimated inflationary cost of medical insurance to the plan participants. I have indicated below the standard premiums as requested for each plan.

Plan 100	2010 January Premium (current level)	2011 January Premium (renewal)	2011 January Premium (if \$750,000 annual)
EE			
EE + Child (if applicable or other appropriate tier)			
EE + Spouse (if applicable or other appropriate tier)		(b)(4)	
Family (if applicable or other appropriate tier)			

Plan HMO/EPO	2010 January Premium (current level)	2011 January Premium (renewal)	2011 January Premium (if \$750,000 annual
EE			
EE + Child (if applicable or other appropriate tier)			
EE + Spouse (if applicable or other appropriate tier)		(b)(4)	
Family (if applicable or other appropriate tier)			

Plan 600	2010 January Premium (current level)	2011 January Premium (renewal)	2011 January Premium (if \$750,000 annual limit was applied)
EE			
EE + Child (if applicable or other appropriate tier)			
EE + Spouse (if applicable or other appropriate tier)		(b)(4)	
Family (if applicable or other appropriate tier)			

Plan 603	2010 January Premium (current level)	2011 January Premium (renewal)	2011 January Premium (if \$750,000 annual limit was applied)
EE		(b)(4)	

EE + Child (if applicable
or other appropriate
tier)
EE + Spouse (if
applicable or other
appropriate tier)
Family (if applicable or
other appropriate tier)

(b)(4)

In order to complete your application, please provide this information as soon as possible, preferably today. We look forward to receiving your completed application.

Thank you,
Lisa Keels

From: Doug Crowell [mailto:d.crowell@callcpc.com]
Sent: Wednesday, November 24, 2010 8:31 AM
To: Keels, Lisa (HHS/OCIIO)
Subject: Follow up to your voice message pertaining to CPC Logistics Waiver
Importance: High

Good morning Lisa

I just walked into the office and retrieved your voice message from yesterday afternoon. I apologize for not getting back to you yesterday but I was at a tax law seminar for the past several days and unfortunately I left my phone charge back in the office and my battery on my blackberry was out of charge so I could not call in and check my messages. I am in the office this morning and would like to the opportunity to discuss with you any questions you may have with respect to our waiver request from the increase of the annual limit.

We have a skeleton office support staff today and I know your time is important and in the event I step away from my desk I don't want to miss your phone call. Therefore, so I don't miss your call I will carry my cell phone with me today and it is convenient for you to call me today, then please call me on my cell phone number so we can discuss your questions. My cell phone number and email address is as follows:

314-330-8938
d.crowell@callcpc.com.

Thank you for your phone call yesterday and I am looking forward in speaking with you. If for some reason we do not connect today as indicated by your voice mail that you will be working remote today I wish you and your family a Happy Thanksgiving. I am traveling all of next week and will have my laptop and Blackberry with me, and yes I will make sure this time I pack my phone charger.

Take care and will speak with you soon.

Doug Crowell, CFO

CPC LOGIST:000019

11/3



October 29, 2010

Department of Health and Human Services
Office of Consumer Information and Insurance Oversight
ATTN: James Mayhew
Room 737-F-04
200 Independence Ave., S.W.
Washington D.C. 20201

Re: Waiver of Annual Dollar Limit Requirements

Dear Mr. Mayhew:

We are seeking a waiver of the requirements related to annual dollar limits on essential health benefits, for the limited medical benefit component of the CPC Logistics Health & Welfare Plan ("the Plan") for the plan year beginning January 1, 2011. For purposes of this application, a reference to "the Plan" means the Plan's limited medical benefit component.

The Plan's benefits are provided under a self-insured arrangement that was offered by the plan sponsor, CPC Logistics Inc., prior to September 23, 2010.

Please find the following information:

- **The terms of the Plan for which a waiver is sought:** The Health Benefit Summary Plan Description is attached to this letter. We have tabbed the pages reflecting various annual dollar limits on essential health benefits (or benefits that may be essential health benefits, where guidance is not clear).
- **The number of individuals covered by the Plan:** (b)(4)
- **The annual dollar limit(s) and rates applicable to the Plan:** The Plan has an overall annual dollar limit on all health benefits including essential health benefits (excluding prescription drugs) of;
 - Plan 100 -
 - EPO Plan -
 - Plan 600 - (b)(4)
 - Plan 603 -



HMO/EPO	Plan 600	Plan 603	Plan 100				
Total Funding	EE Contribution - est at (b)(4)	Total Funding	EE Contribution - est at (b)(4)	Total Funding	EE Contribution - est at (b)(4)	Total Funding	EE Contribution - est at (b)(4)

NOTE: EE contributions may vary based on subgroup

- **Why compliance would result in a significant decrease in coverage or significant increase in premiums:** We have attached to this letter a certification reflecting the adverse impact on coverage, were the Plan to comply with minimum annual dollar limits on essential health benefits as specified in applicable federal regulations.

Attestation

I hereby attest that the Plan which is the subject of this waiver application was in force prior to September 23, 2010, and that the application of restricted annual limits to the Plan would result in a significant decrease in access to benefits for those currently covered by the Plan, or a significant increase in premiums paid by those covered by the Plan.

Plan Administrator

By:

Name: **Douglas J. Crowell**
Title: **VP & CFO**

14528 South Outer Forty Road, Suite 210
Chesterfield, Missouri 63017
314/542-2266 800/274-3746 314/542-0666 Fax
www.callcpc.com



Shannon S. Demaree, ASA, MAAA
Vice President, Actuarial Services

October 25, 2010

Department of Health and Human Services
Office of Consumer Information and Insurance Oversight
ATTN: James Mayhew
Room 737-F-04
200 Independence Ave., S.W.
Washington D.C. 20201

Dear Mr. Mayhew:

CPC Logistics, Inc. currently offers its employees a comprehensive plan covering medical and prescription drugs that is subject to an annual maximum of (b)(4) on one plan and (b)(4) on the other plans. With the changes required under Health Reform, CPC must increase this annual maximum to \$750,000 in 2011, (b)(4) in 2012, (b)(4) in 2013, and ultimately eliminate it in 2014.

In order to remove the current annual maximums and avoid a cost increase to members, the plan would have to be changed as follows:

Increase out-of-pocket maximums
Increase coinsurance percentages
Increase Emergency Room copays
Increase Specialty copays

(b)(4) based on plan
(b)(4) (based on plan)
(b)(4) (based on plan)

If you have any questions, please feel free to contact me.

Sincerely,

Shannon S. Demaree, ASA, MAAA
Vice President, Actuarial Services

LOCKTON BENEFIT GROUP
A DIVISION OF LOCKTON COMPANIES
444 WEST 47TH STREET, SUITE 600 / KANSAS CITY, MO 64112-1919
(816) 960-9001 / FAX: (816) 960-9579

CPC LOGIST:000022

Pages 23 through 156 redacted for the following reasons:

Exemption 4

From: Keels, Lisa (HHS/OCIIO)
Sent: Wednesday, November 24, 2010 10:30 AM
To: Doug Crowell
Cc: Habit, Sandra (HHS/OCIIO)
Subject: RE: Follow up to your voice message pertaining to CPC Logistics Waiver
Hello Doug,

Thank you for speaking with me this morning and for your application for the Waiver of the Annual Limits Requirements of the PHS Act Section 2711. As we discussed, in order to complete your application, please provide the following information:

- Please confirm that you are seeking a waiver for the following plans: Plan 100, EPO Plan, Plan 600, and Plan 603 (the non-Massachusetts plans).
- In your application, you state that (b)(4) individuals are covered by the Plan. Please provide the number of individuals covered by each plan (i.e., Plan 100, EPO Plan, Plan 600, and Plan 603).
- Please confirm whether the plans are limited benefit or comprehensive plans.
- Please state whether these plans are grandfathered plans.
- Please confirm that you plan to remove the lifetime limits on all the plans, in order to be in compliance with the Affordable Care Act.
- For each plan, please provide the current monthly premium rates and the projected monthly premium rates applicable to the plan if the plan were to comply with the restricted annual benefits. In other words, we would like a chart that reflects the following information:

	2010 January Premium (current level)	2011 January Premium (renewal)	2011 January Premium (if \$750,000 annual limit was applied)
EE			
EE + Child (if applicable or other appropriate tier)			
EE + Spouse (if applicable or other appropriate tier)			
Family (if applicable or other appropriate tier)			

In order to complete your application, please provide this information as soon as possible, preferably today. We look forward to receiving your completed application.

Thank you,
Lisa Keels

From: Doug Crowell [mailto:d.crowell@callcpc.com]
Sent: Wednesday, November 24, 2010 8:31 AM
To: Keels, Lisa (HHS/OCIIO)
Subject: Follow up to your voice message pertaining to CPC Logistics Waiver
Importance: High

Good morning Lisa

I just walked into the office and retrieved your voice message from yesterday afternoon. I apologize for not getting back to you yesterday but I was at a tax law seminar for the past several days and unfortunately I left my phone charge back in the office and my battery on my blackberry was out of charge so I could not call in and check my messages. I am in the office this morning and would like to the opportunity to discuss with you any questions you may have with respect to our waiver request from the increase of the annual limit.

We have a skeleton office support staff today and I know your time is important and in the event I step away from my desk I don't want to miss your phone call. Therefore, so I don't miss your call I will carry my cell phone with me today and it is convenient for you to call me today, then please call me on my cell phone number so we can discuss your questions. My cell phone number and email address is as follows:

314-330-8938
d.crowell@callcpc.com.

Thank you for your phone call yesterday and I am looking forward in speaking with you. If for some reason we do not connect today as indicated by your voice mail that you will be working remote today I wish you and your family a Happy Thanksgiving. I am traveling all of next week and will have my laptop and Blackberry with me, and yes I will make sure this time I pack my phone charger.

Take care and will speak with you soon.

Doug Crowell, CFO

CPC LOGIST:000025

From: Doug Crowell [d.crowell@callcpc.com]
Sent: Wednesday, November 24, 2010 12:54 PM
To: Keels, Lisa (HHS/OCIO)
Cc: Habit, Sandra (HHS/OCIO)
Subject: RE: Follow up to your voice message pertaining to CPC Logistics Waiver

Importance: High
Good Morning Lisa

Thank you once again for taking the time this morning and discussing the questions you have with respect to our companies application for a Waiver from the Department of Health and Human Services with respect to the annual limit. [I have provided my answers and relevant information below each question you have asked.](#)

-
As I mentioned to you on the phone, I will be traveling Friday of this week as well as all of next week. In the event you, your supervisor and the reviewer of this application has any further questions please do not hesitate to contact me on my cell phone. My cell phone number is 314-330-8938.

Thank you for considering our application and have a good Thanksgiving day.

Doug

From: Keels, Lisa (HHS/OCIO) [mailto:Lisa.Keels@hhs.gov]
Sent: Wednesday, November 24, 2010 9:30 AM
To: Doug Crowell
Cc: Habit, Sandra (HHS/OCIO)
Subject: RE: Follow up to your voice message pertaining to CPC Logistics Waiver

Hello Doug,

Thank you for speaking with me this morning and for your application for the Waiver of the Annual Limits Requirements of the PHS Act Section 2711. As we discussed, in order to complete your application, please provide the following information:

- Please confirm that you are seeking a waiver for the following plans: Plan 100, EPO Plan, Plan 600, and Plan 603 (the non-Massachusetts plans).
Answer: Yes this correct we are seeking the waiver for all Plans with the exception of those employees covered under the Massachusetts plan which has (b)(4) plan participants.
- In your application, you state that (b)(4) individuals are covered by the Plan. Please provide the number of individuals covered by each plan (i.e., Plan 100, EPO Plan, Plan 600, and Plan 603).
Answer: Plan 100 has (b)(4) plan participants, Plan HMO-EPO has (b)(4) plan participants, Plan 600 as (b)(4) plan participants and Plan 603 has (b)(4) plan participants
- Please confirm whether the plans are limited benefit or comprehensive plans.
Answer: All of our plans are full medical comprehensive plans with a annual limit as specified in the plan documents which were submitted. (Plan 100 has a (b)(4) limit, Plan EPO, Plan 600 and Plan 603 all have a (b)(4) annual limit.
- Please state whether these plans are grandfathered plans.
Answer: Providing the waiver is obtained the plans will remain grandfathered. Otherwise the company will have to make plan changes and increase in the employee share of the premium greater than the (b)(4) increase limit and thus

CPC LOGIST:000026

will result in the Plans to lose Grandfather status.

- Please confirm that you plan to remove the lifetime limits on all the plans, in order to be in compliance with the Affordable Care Act.

Answer: Yes, the plans will have no life time limit effective January 1, 2011 as to be in compliance with the Affordable Care Act.

- For each plan, please provide the current monthly premium rates and the projected monthly premium rates applicable to the plan if the plan were to comply with the restricted annual benefits. In other words, we would like a chart that reflects the following information: Response: Please note that if the waiver is not obtained substantial changes, modifications and benefit reduction to the plans will have to be made as specified in our original letter to HHS dated October 29, 2010. In addition to decreasing benefits, premiums will have to be increased above and beyond the estimated inflationary cost of medical insurance to the plan participants. I have indicated below the standard premiums as requested for each plan.

Plan 100	2010 January Premium (current level)	2011 January Premium (renewal)	2011 January Premium (if \$750,000 annual limit was applied)
EE			
EE + Child (if applicable or other appropriate tier)			
EE + Spouse (if applicable or other appropriate tier)		(b)(4)	
Family (if applicable or other appropriate tier)			

Plan HMO/EPO	2010 January Premium (current level)	2011 January Premium (renewal)	2011 January Premium (if \$750,000 annual limit was applied)
EE			
EE + Child (if applicable or other appropriate tier)			
EE + Spouse (if applicable or other appropriate tier)		(b)(4)	
Family (if applicable or other appropriate tier)			

Plan 600	2010 January Premium (current level)	2011 January Premium (renewal)	2011 January Premium (if \$750,000 annual limit was applied)
EE		(b)(4)	

CPC LOGIST:000027

EE + Child (if applicable or other appropriate tier)	
EE + Spouse (if applicable or other appropriate tier)	(b)(4)
Family (if applicable or other appropriate tier)	

Plan 603	2010 January Premium (current level)	2011 January Premium (renewal)	2011 January Premium (if \$750,000 annual limit was applied)
EE			
EE + Child (if applicable or other appropriate tier)			
EE + Spouse (if applicable or other appropriate tier)		(b)(4)	
Family (if applicable or other appropriate tier)			

In order to complete your application, please provide this information as soon as possible, preferably today. We look forward to receiving your completed application.

Thank you,
Lisa Keels

From: Doug Crowell [mailto:d.crowell@callcpc.com]
Sent: Wednesday, November 24, 2010 8:31 AM
To: Keels, Lisa (HHS/OCIIO)
Subject: Follow up to your voice message pertaining to CPC Logistics Waiver
Importance: High

Good morning Lisa

I just walked into the office and retrieved your voice message from yesterday afternoon. I apologize for not getting back to you yesterday but I was at a tax law seminar for the past several days and unfortunately I left my phone charge back in the office and my battery on my blackberry was out of charge so I could not call in and check my messages. I am in the office this morning and would like to the opportunity to discuss with you any questions you may have with respect to our waiver request from the increase of the annual limit.

We have a skeleton office support staff today and I know your time is important and in the event I step away from my desk I don't want to miss your phone call. Therefore, so I don't miss your call I will carry my cell phone with me today and it is convenient for you to call me today, then please call me on my cell phone number so we can discuss your questions. My cell phone number and email address is as follows:

CPC LOGIST:000028

314-330-8938

d.crowell@callcpc.com.

Thank you for your phone call yesterday and I am looking forward in speaking with you. If for some reason we do not connect today as indicated by your voice mail that you will be working remote today I wish you and your family a Happy Thanksgiving. I am traveling all of next week and will have my laptop and Blackberry with me, and yes I will make sure this time I pack my phone charger.

Take care and will speak with you soon.

Doug Crowell, CFO



DEPARTMENT OF HEALTH & HUMAN SERVICES

Office of Consumer Information and
Insurance Oversight
Washington, DC 20201

Date: October 2010

From: Steve Larsen, Director, Office of Oversight 

Subject: Application for Waiver of the Annual Limits Requirements of PHS Act Section 2711

Dear Waiver Applicant:

Section 2711(a)(2) of the Public Health Service Act (PHS Act), as added by the Patient Protection and Affordable Care Act (Affordable Care Act), requires the Secretary to impose restrictions on the imposition of annual limits on the dollar value of essential health benefits (as defined in section 1302(b) of the Affordable Care Act) for any participant or beneficiary in a new or existing group health plan or a new policy in the individual market for plan or policy years beginning on or after September 23, 2010 and prior to January 1, 2014. Specifically, the Secretary is granted the authority to determine what constitutes a "restricted annual limit" that can still be imposed under such plans or policies prior to January 1, 2014.

The interim final regulations published on June 28, 2010 (codified at 26 CFR § 54.9815-2719T; 29 CFR § 2590.715-2719; and 45 CFR § 147.126) established such restricted annual limits. The regulations also provided that these restricted annual limits may be waived by the Secretary of Health and Human Services (HHS) if compliance with the interim final regulations would result in a significant decrease in access to benefits or a significant increase in premiums. Pursuant to the regulation, HHS issued guidance on September 3 regarding the scope and process for applying for a waiver.

The Office of Consumer Information and Insurance Oversight, Office of Insurance Oversight received and processed your application for the plan(s) or policy(ies) year beginning January 1, 2011. We have determined that your application has met the criteria to obtain a waiver of the restricted annual limits requirements because compliance with the interim final regulations would result in a significant decrease in access to benefits for those currently covered by such plans or policies, or a significant increase in premiums paid by those covered by such plans or policies. To the extent you make any change to your benefit package after March 23, 2010, you must determine whether the change(s) will trigger loss of grandfathering status pursuant to 45 CFR § 147.140(g)(1).

An approval of your request for waiver of the restricted annual limits requirements granted under this process applies only to the annual limit(s) provided in your application for the plan or policy year beginning between September 23, 2010 and September 23, 2011. This waiver only applies to the annual limits requirements in Section 2711 of the ACA and does not apply to any other requirement of the Affordable Care Act, ERISA, the IRS Code or the PHS Act. Further, a group

health plan or health insurance issuer must reapply for any subsequent plan or policy year prior to January 1, 2014 when this waiver expires in accordance with future guidance from HHS. HHS may modify this waiver approval process memorandum and other relevant information.

If you have any questions regarding this letter, please email OCIIOOversight@hhs.gov.