

PUBLIC SUBMISSION

Received: January 05, 2018
Status: Pending_Post
Tracking No. 1k2-90r8-1pec
Comments Due: March 06, 2018
Submission Type: Web

Docket: EBSA-2018-0001

Definition of Employer Under Section 3(5) of ERISA-Association Health Plans

Comment On: EBSA-2018-0001-0001

Definition of Employer Under Section 3(5) of ERISA-Association Health Plans

Document: EBSA-2018-0001-DRAFT-0023

Comment on FR Doc # 2017-28103

Submitter Information

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General Comment

Please include this proposed regulation in ERISA regulations. Our small business is an architectural firm with one architect (owner) and one employee (office manager). Our insurance costs for premiums will exceed \$28,000 in 2018 for 2 adults and one dependent. When the cost of deductibles is figured in, the actual cost exceeds \$36,000 before the insurance will pay for covered services other than doctor office visits. As we age, this will continue to increase.

Most architectural firms qualify as small businesses and are members of American Institute of Architects (AIA), Construction Specifications Institute (CSI) or National Council of Architectural Registration Boards (NCARB). These are national organizations that already provide other services and could provide the structure to become group insurance providers. Currently, small businesses like ours are treated unfairly because there is no "union" structure under which we can purchase insurance even though annual dues are paid. Allowing this proposal to become law will not only help us financially, but with a large organization, such as those above, already acting on behalf of its members in other situations, it will hold insurance companies to more efficient and effective treatment of the insured by managing the plans.