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

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

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General Comment

Dear sirs, I am writing to register a suggestion with the NAR to expand the definition of "employer", advocating for broad inclusion of self-employed individuals in AHPs and removal of unnecessary regulatory restrictions.

Currently I am "self employed" as a Realtor and have been for the past 17 years. In the past 17 years I have paid very high costs for a monthly insurance premium. Currently my monthly Blue Cross premium is \$1091.91 for my individual policy. Yes that much, I am not on a family plan.

I am asking the Department of Labor pass the NAR's proposal to broaden the definition of "employer" to include "working owners" This "PROPOSED" rule has the potential to create a framework that would allow NAR (or state/local associations) to offer health benefits through a large group health plan, which is different from where members may be currently enrolled (a small group or individual market health plan). As a result, more small businesses and self-employed individuals participating in an

AHP will no longer be subject to Affordable Care Act (ACA) small group and individual market rules, such as certain benefit requirements that may increase costs. I do understand that most AHPs will still be subject to state benefit mandates, but forming AHPs will give small employers and self-employed individuals more flexibility in health plan design, which may also result in lower costs. Please consider NAR's proposal so Realtors may be recipients of lower monthly Health insurance premiums.