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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

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General Comment

February 13, 2018

Office of Regulations and Interpretations
Employment Benefits Security Administration
U.S. Department of Labor, Room N-5655
200 Constitution Avenue, NW
Washington, DC 20210

Attn: Definition of Employer - Small Business Health Plans RIN 1210-AB85

To the Docket:

I am the owner of The Blackshear Times in Blackshear, Georgia My company has been in operation for 149 years and I currently have four employees We would like to expand the news coverage of our town, but one of the biggest barriers to doing so is the high cost and lack of choices for health insurance.

Getting good health insurance for me and my employees wasn't easy before the Affordable Healthcare Act and things have only gotten worse since the law was passed. For example, it would be difficult today for us to even continue to operate if my wife and I were not old enough to qualify for Medicare. We have continually upped our deductibles in an effort to be able to afford the coverage we offer and, unfortunately, between the premiums and the deductibles, our employees have gotten where they simply pray to never need their coverage. Obviously, that is a bad situation. My wife says the rising cost and red tape in dealing with health care coverage has long been the single biggest headache she deals with in handling the "business side" of our operation. We added health insurance years ago because it enabled us to attract the best employees. Now, because a small operator like us can't offer anything much better than catastrophic coverage, our benefit advantage has vanished.

I'm excited by the Labor Department's efforts to expand healthcare options and I believe association health plans (AHPs) can be a solution for small businesses like mine. My company belongs to the National Newspaper Association and it has tried to help members like me obtain affordable, quality health coverage, but it's too difficult under the current rules for my association to offer healthcare options across state lines. If we could pool our small company with others in our association and, in turn, allow the association to combine our pool with those in related industries, I believe we could attract an underwriter for a favorable group plan.

I urge that the Dept. of Labor's rule to implement President Trump's Executive Order make it possible for associations like mine to more easily and efficiently offer health coverage options to members across state lines. I also urge the rule to make it clear that smaller associations in the same industry, such as printing and publishing, can band together to form Multi-Association Health Plans (MAHPs) to form a larger pool of employees that will attract underwriters and better options.

In your final rule, please make Association Health Plans attractive and affordable by letting us purchase insurance in the large group market and letting small associations like ours form partnerships with related associations to create larger and more attractive pools of insured people. With enough economy of scale, we believe we can find an option that lets us continue to provide the news coverage and information opportunities needed in our town.

Thank you,

Robert M. Williams, Jr.
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