

# PUBLIC SUBMISSION

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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

Office of Regulations and Interpretations, Employee Benefits Security Administration, Room N-5655, U.S. Department of Labor, 200 Constitution Avenue NW, Washington, DC 20210, Attention: Definition of Employer--Small Business Health Plans RIN 1210-AB85.

We have had Health Insurance with PFB-Pennsylvania Farm Bureau since 1969.

We had a family plan, a couple's plan and now have a senior supplement -- since we are retired.

We were so happy that we could use our Pennsylvania Farm Bureau to purchase our insurance from rather than having to go on a much higher non-group plan. We came back to the farm full time after my husband had been employed by International Harvester Company.

We have enjoyed this benefit through our association with PFB. This ability to know that the people of our group were working on our behalf to save us money and we had

a CHOICE as to what we could afford and what met our needs. As our children grew and left home we became a couple and were able to continue with our plan (Blue Cross/Blue Shield). Then we retired and became "Seniors" and were offered a plan choice which we would need for our changing health as we aged.

THEN all of a sudden we had no choice -- oh, yes they said there was, but, not so. We, because of health changes for my husband, had to choose the most expensive plan to get the same coverage we had (which would make it better, NOT) it became a nightmare of trying to make a good choice -- even with the help of our group - no one knew what to do, and there hands were tied. The cost is out of sight for those of us who are on SSI we spend over half of our income on insurance, (Health, Drug - which used to be together). Then when you had it figured out they changed it again. PLUS - our group was no longer able to offer us a CHOICE. We have good Dr.'s and they have tried there best to work with us, but the paper work you have to go through is a nightmare. I know many who have had to just do without, because of the cost and we are getting there soon.

The Drug co-pay costs is another nightmare also. Many of the insurance people try to push you on the "Advantage Plan" which is wrong for those of us who have illnesses. It would be great to pay \$0 but by the time you get to 70 who can afford the deductibles and don't even think about traveling. You can't leave the state or you have no insurance.

It is really all about CHOICE - which if you have state or federal insurance plan you don't have to worry. However, not having that choice, we have to wade through the insurance nightmare ourselves, because our GROUP can't give us a choice.

Please give our Group the opportunity to help us wade through this -- illness is difficult enough without having to worry about going broke also.

In early January, the U.S. Department of Labor released a proposed rule - (Office of Regulations and Interpretations, Employee Benefits Security Administration, Room N-5655, U.S. Department of Labor, 200 Constitution Avenue NW, Washington, DC 20210, Attention: Definition of Employer--Small Business Health Plans RIN 1210-AB85.)

This may eventually enable PFB to once again offer a group health insurance program. Please help us to have this wonderful group be able to help us wade through health insurance nightmare and be able to have a CHOICE in our health care; we have a wonderful group of people at PFB to help with more choices that will match every ones needs. Singles, Families, Couples and SENIORS.

Thank You for your attention to this vital matter.