

PUBLIC SUBMISSION

Received: February 19, 2018 Status: Pending_Post Tracking No. 1k2-9119-a7t5 Comments Due: March 06, 2018 Submission Type: API
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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-0178

Comment on FR Doc # 2017-28103

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General Comment

Independent contractors are the real job creators of the future. If the industry wants to stay competitive and innovative by attracting new talent, then it must allow Realtors and their associations to use their collective bargaining ability to provide its members more affordable health care options as a group vs. individual market plans. These high health care cost act as a deterrent and/or barrier to entry for many of the members and future licensees.