

# 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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Comment on FR Doc # 2017-28103

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## Submitter Information

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## General Comment

Re: Definition of Employer under Section 3(5) of ERISA-Association Health Plans; RIN 1210-AB85 or Docket ID No. 2017-28103 (submitted electronically)

As a member of the National Association of REALTORS, I support the proposed regulation to enable self-employed individuals to participate in Association Health Plans (AHPs). The Department of Labors effort is a promising step to providing more affordable insurance options as health care costs continue to rise while choices for coverage are steadily shrinking.

My husband and I are both Realtors. We don't have any employer insurance option. When our grandfathered insurance plan was discontinued last year, we were stunned at the cost for new insurance. In my state, there is only one insurance company option, BCBS, and we were given the choice of paying \$30,000 per year or over \$40,000 per year for insurance for our healthy, drug free, disease free, smoke free family of four. I called the state Insurance Commissioner and learned about MEWAs, but we cant do that. We found an affordable option with a specified diseases/sicknesses plan, but the coverage is full of holes, very limited, and is not real insurance. The National Association of Realtors is the largest trade association in America. Why can we not have access to affordable group health insurance? We desperately

need change now.

This rule proposes to provide more affordable choices for independent contractors by modifying the definition of employer to include working owners. This is essential to enabling real estate professionals and their families to participate in an AHP in the large group market. The large group market typically offers more flexibility in insurance plan design and improved negotiating power to bargain for lower premiums benefits that are key to driving down health care costs. The proposed rule would also protect consumers enrolling in these plans by prohibiting discrimination based on health status.

The need for affordable health insurance options remains a top concern among practicing real estate professionals. Allowing working owners to participate in AHPs while removing unnecessary limits could expand access to more affordable health care options for many more families.

I urge you to finalize the proposed rule with these comments in mind. Thank you for the opportunity to weigh in on this important issue that is so dramatically affecting my family and the families of many of my fellow Realtors.

Sincerely,

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