

PUBLIC SUBMISSION

Received: March 05, 2018 Status: Pending_Post Tracking No. 1k2-91ui-6j0o Comments Due: March 06, 2018 Submission Type: API

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-0506

Comment on FR Doc # 2017-28103

Submitter Information

Name: Cynthia Butts

Address: 111 Founders Plz, Ste 1101

East Hartford, CT, 06108

Email: info@ctrealtors.com

Phone: (860) 290-6601

Organization: Connecticut Association of REALTORS

General Comment

3/5/2018

Mr. Alexander Acosta

Secretary of Labor

U.S. Department of Labor

900 Constitution Avenue NW

Washington, D.C. 20210

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

Dear Secretary Acosta:

The Connecticut Association of REALTORS represents nearly 17,000 members the state of Connecticut. As self-employed individuals, it is often difficult for real estate professionals to find affordable health care coverage when costs are continually rising and insurance options are diminishing. The Department of Labors notice of proposed rulemaking has the potential to increase health insurance options, which is greatly welcomed by real estate professionals and their families.

It is exceedingly difficult for REALTORS in Connecticut to get affordable health insurance due to the limited number of providers in our state. Our Association gets requests weekly for options, but they dont presently exist.

The 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 to participate in an AHP in the large group market, rather than being forced to purchase in the more costly and volatile individual insurance market. Large group plans typically have more flexibility in plan design and offer greater negotiating power to bargain for lower premiums benefits that are key to reducing health care costs. The rule would also protect consumers enrolling in these plans by prohibiting discrimination based on health status.

However, the proposed rule includes provisions that may restrict many self-employed persons from seeking more affordable insurance in an AHP. For example, working owners are excluded from eligibility if they have an offer of coverage from a spouses employer subsidized group health plan. Coverage available through a spouses employer may not be the most affordable option for a family. Eliminating this requirement will provide more insurance choices for many real estate professionals and their families.

The need for affordable health insurance options remains a top concern among practicing real estate professionals. Allowing working owners to participate in AHPs will offer new options for health insurance coverage, providing much needed relief that will support the real estate industry as a whole. Ensuring the proposed rule does not impose burdensome, unnecessary requirements on working owners is also essential.

Thank you for the opportunity to comment on this proposed rule.