

PUBLIC SUBMISSION

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Definition of Employer Under Section 3(5) of ERISA-Association Health Plans

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General Comment

I am the vice chair of the Solo and Small Firm section of my state bar association in Louisiana. Most of the attorneys in this group are self-employed, and many have no options for health insurance other than the Affordable Care Act "Marketplace" plans. Based on my experience and discussions with our members, these marketplace plans are unaffordable. Some cannot afford to purchase insurance at all; others purchase the insurance but never receive any benefit from it because the deductibles are so high; and still others purchase catastrophic plans that do not cover much. Louisiana offers very few marketplace plans now, and the choices have been reduced to only two insurance companies. Self-employed attorneys would hopefully benefit from the proposed regulations, which might permit them to form an association based on commonality of profession and obtain better insurance rates than those offered by the marketplace. I encourage the Department of Labor to adopt the proposed regulations in order to permit self-employed individuals and small business owners to negotiate better rates than the few, dwindling options offered by the healthcare.gov marketplace.