



March 6, 2018

The Honorable Alexander Acosta, Secretary of Labor  
U.S. Department of Labor  
Office of Regulations and Interpretations Employee Benefits Security  
Administration  
200 Constitution Avenue, NW  
Washington, DC 20210

Re: RIN 1210-AB85

Dear Mr. Secretary:

The National Association of Physician Recruiters (NAPR) is the non-profit professional association of individuals who recruit physician and advanced practice clinicians in America. The majority of these individuals are small companies or firms that have a challenge finding affordable healthcare.

Small businesses constitute the backbone of our national workforce and the increasing cost of health insurance premiums, is a significant financial challenge. Certain Association Health Plans (AHPs), for membership organizations may allow associations like NAPR to aggregate our members' workforce and leverage more advantageous insurance plans that provide a higher quality of care at a lower premium cost. With some of the proposed changes, small businesses would be able to offer more competitive benefits, allowing them to compete with large employers and competitors to retain and recruit employees. The Department of Labor's notice of proposed rulemaking has the potential to increase new health insurance options, which is greatly welcomed by NAPR, our industry and our members.

The proposed changes to the rule may provide more affordable healthcare insurance options for small businesses by modifying the definition of "employer". This is essential to enable small businesses 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

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plan design and options, which offer greater negotiating power to bargain for lower premiums. These benefits of scale are key to reducing insurance premiums.

The need for affordable health insurance options remains a top concern among our practicing professionals. Allowing working owners to participate in AHPs will offer new options for health insurance coverage, providing much needed relief for the industry and to our members. We also suggest that the proposed rule not impose burdensome and unnecessary requirements on working owners or participants in the AHPs.

NAPR understands that there are many nuances and challenges that need to be worked out with the proposed change to section 3(5) of the Employee Retirement Income Security Act (ERISA) however, that should not delay the opportunity to provide long needed relief to small businesses. Our general comments are meant to inform them Department that our industry would benefit from increased options and addressing the AHP issue is a great start.

We welcome the Department's proposed regulations since we believe that AHPs can help provide higher quality employee benefits at lower costs, especially for small employers who have fewer choices every plan year.

NAPR appreciates this opportunity to comment, and are willing to assist in this effort in any way we can.

Sincerely,

Wanda Parker, President  
National Association of Physician Recruiters