

PUBLIC SUBMISSION

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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

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Submitter Information

Name: Chris DiCarlo

Address: 1117 Perimeter Center West

Atlanta, Georgia, 30338

Email: cdicarlo@snellingswalters.com

Phone: 7705083015

Organization: Snellings Walters

General Comment

As a benefits consultant, we frequently hear small groups who are struggling to provide health insurance for their employees. Specific industries we hear this from: Agricultural, Farming, Real Estate, Financial, and Construction. The standard small group insurance market is a nightmare to navigate. Associations are filled with passionate people who care deeply about their professional trade. The passing of this rule would greatly improve the strength of these associations and provide additional loyalty from employees to specific trades. Having the opportunity for Associations to give a choice a health insurance would impact millions of people for the better.

One question: Would this be open to contract 1099 employees or employees on commission?