

**Ohio Court Reporters Association
OCRA Cardinal Foundation**

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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 Ohio Court Reporters Association is a non-profit professional association representing court reporters, broadcast and CART captioners, and legal videographers in the state of Ohio. Our members provide an accurate record of legal proceedings, provide closed captions for individuals who are deaf or hard-of-hearing, and provide access in educational and other settings to participants with hearing disabilities. The majority of these Ohio professionals are independent contractors or small business owners that have a challenge finding affordable healthcare.

Small businesses make up 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 the Ohio Court Reporters Association 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 greater 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 welcomed by the Ohio Court Reporters Association, 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 plan design and options which offer greater opportunity to bargain for lower premiums.

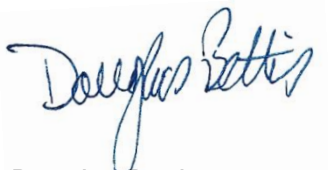
The need for affordable health insurance options remains a top concern among our practicing professionals. Allowing working owners to participate in AHPs will offer new options for health insurance coverage, giving much needed relief for the industry and to our members. We also suggest that the proposed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

The Ohio Court Reporters Association 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 give long-needed relief to small businesses. Our general comments are meant to inform the 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 business owners who have fewer choices every plan year.

The Ohio Court Reporters Association appreciates this opportunity to comment, and we are willing to assist in this effort in any way we can.

Sincerely,

A handwritten signature in blue ink that reads "Douglas Bettis". The signature is written in a cursive style with a large, prominent "D" and "B".

Douglas Bettis
2017-2018 President