



National Association for the Self-Employed
6870 Lebanon Rd, Suite 100
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December 28, 2018

The Honorable Steven Mnuchin
Secretary
U.S. Department of the Treasury
1500 Pennsylvania Avenue, NW
Washington, D.C. 20220

The Honorable Alexander Acosta
Secretary
U.S. Department of Labor
200 Constitution Avenue, NW
Washington, D.C. 20210

The Honorable Alex Azar
Secretary
U.S. Department of Health & Human Services
200 Independence Avenue, SW
Washington, D.C. 20201

RE: REG-136724-17
Submitted via www.regulations.gov

Dear Secretaries Mnuchin, Acosta and Azar:

On behalf of millions of self-employed and micro business owners, the National Association for the Self-Employed (NASE) submits the following comments on the notice of proposed rulemaking (NPRM) entitled Health Reimbursement Arrangements and Other Account-Based Group Health Plans (REG-136724-17) issued by the U.S. Departments of the Treasury, Labor, and Health and Human Services. The NASE has long championed and advocated for a reversal of treatment of Health Reimbursement Arrangements that were implemented by the previous Administration. We believe that the self-employed and micro-business owners should have as many tools available to them to deal with rising health care costs and having access to HRAs is essential to ensuring that all Americans can have affordable health care.

With the vast majority of Americans, roughly 180 million, receiving health care through an employer-sponsored system, the self-employed and micro-business business owners have largely been unable to offer coverage to their employees due to costly burdensome requirements and mandates, resulting in them being unable to offer health care benefits, in any form. In fact, the number of small businesses offering group health insurance has declined by 25 percent since 2010. Currently, less than half of small businesses offer any kind of health insurance to their workers. The smallest of businesses are being treated unfairly in the current marketplace, however, the opportunity for a small employer to offer and a self-employed individual to benefit from an HRA for the purchase of individual health coverage (IHC) will help millions of businesses offer a meaningful benefit to their employees.

We support allowing an employee to fund an HSA that can be used with an HSA-compatible



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does not provide reimbursement for out-of-pocket expenses is compatible with a health savings account (HSA).

We thank you for the hard work that has been done to undo a punitive policy that hurt millions of self-employed and micro-business owners. We urge to you move swiftly in finalizing the final rule in order to ensure that as many individuals benefit from this policy.

Respectfully,
National Association for the Self-Employed