



Dr. Allen Feezor  
Chair, Federal Advisory Board on  
Consumer Oriented and Operated Plans

Dr. Feezor,

The Advisory Board meeting on March 14<sup>th</sup> was extremely productive and informative. Thank you for the opportunity to attend and participate. We have reviewed the Board's proposals, and believe there is a lot of helpful guidance included in the recommendations. The one issue that wasn't addressed in the Board's report or at the meeting is the definition of the term "related entity". I am writing to share one of the definitions that we included in our official comments to HHS. I hope this is of some use to the Board's work.

To ensure that true non-profit, membership organizations that have experience delivering health insurance can participate in the program, HHS could exclude organizations that are exempt from federal taxation under 501(c)(3) or 501(c)(4) of the Internal Revenue Code from the definition of related entity. This solution would effectively bar nonprofit health insurers from participating, as they are not tax exempt, and would allow organizations like Freelancers Union to participate in the program.

I know the many issues are complex and you are working at lightning speed to finalize your recommendations, so I appreciate you taking the time to consider our thoughts and suggestions. Let me know if I can be helpful in any way.

Best,

Sara Horowitz  
Executive Director  
Freelancers Union

