



AMERICAN BENEFITS COUNCIL

April 8, 2014

The Honorable John Boehner
Speaker
U.S. House of Representatives
Washington, D.C. 20515

The Honorable Nancy Pelosi
Minority Leader
U.S. House of Representatives
Washington, D.C. 20515

RE: Support for H.R. 4414 - Expatriate Health Coverage Clarification Act

Dear Speaker Boehner and Leader Pelosi:

I write on behalf of the American Benefits Council (“Council”) to express support for H.R. 4414, the Expatriate Health Coverage Clarification Act of 2014 (“Act”). The Act provides important clarification regarding application of the Affordable Care Act (ACA) to health coverage that is provided to globally mobile employees. These are issues of significant concern to multinational employers, their employees and families.

The Council is a public policy organization representing principally Fortune 500 companies and other organizations that assist employers of all sizes in providing employee benefits. Collectively, our members either sponsor directly or provide services to health and retirement plans that cover more than 100 million Americans both within the United States and abroad.

Most of our member companies sponsor health coverage for a workforce that includes globally mobile employees. Council members rely on expatriate health plans to provide benefits that meet the unique needs of this employee population and their families. Multinational employers value expatriate health plans for many reasons, including the role they play in recruiting and retaining a productive globally mobile workforce by ensuring coverage of their employees’ and families’ health care needs while abroad.

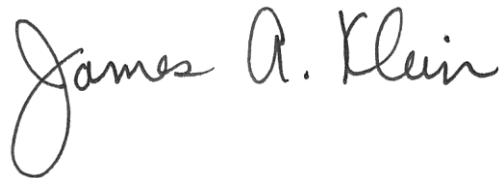
The ACA was intended to reform the U.S. health care system. Its application to expatriate health plans and to the employer sponsors and people covered by such plans,

has created compliance uncertainty with respect to the law's individual and employer mandates and certain other health plan requirements. Although some of these matters have been addressed in transition guidance issued by the agencies, the guidance is temporary and does not fully address the outstanding concerns.

H.R. 4414 provides needed statutory clarification with respect to the application of the ACA to expatriate health plans and the employers, employees and family members that rely on such plans to meet the health benefits needs of a globally mobile workforce.

We appreciate your consideration of these important issues.

Sincerely,

A handwritten signature in black ink that reads "James A. Klein". The signature is written in a cursive style with a large, looping initial "J".

James A. Klein
President

cc: The Honorable David Camp
The Honorable Sander Levin