As discussed during our recent webinar, the finalized DOL regulations for qualifying “association health plans” will likely create new opportunities for sole proprietors and other primarily small businesses and other trade groups to band together in a coordinated manner to purchase more affordable health insurance as a “single employer” in 2019 and beyond. That said, business and state regulatory challenges remain that could impact the realistic viability of these arrangements in the short-term unless and until further DOL guidance is released. Insurance carrier receptivity to offering coverage options to qualifying association plans remain uncertain and state regulatory response to these new regulations are also beginning. As an example, Vermont has already announced emergency plans to amend existing regulations to immediately impose additional requirements on association plans under that state’s jurisdiction and control. New York and Massachusetts have also threatened to sue to prevent implementation of these new rules in their states. We are actively watching all developments in each state, and assisting organizations in evaluating the feasibility of these arrangements given the context of current circumstances.