

From: Michael Stratton [MikeS@stratton-insurance.com]
Sent: Thursday, September 03, 2015 8:20 PM
To: WINKEL Karen J * DCBS
Subject: Group Size Document

Hi Karen,

In general I think this document looks OK. I am concerned about the lack of real clarity regarding what qualifies someone as a seasonal employee, and think that clearly defining a seasonal employee is a necessity. We have employers that will work people 10 or 11 months a year and still call them seasonal. I thought that ACA was going to make it a situation where if folks worked 30 hours a week for over 120 days they could no longer be considered seasonal. It doesn't seem that this is being enforced if this was going to be the case.

Thanks and have a great day.

Mike

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