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February 4, 2014

The Honorable Dave Camp (MI-04)
Chairman
House Ways and Means Committee
1102 Longworth House Office Building
Washington, D.C. 20515

The Honorable Sander Levin (MI-09)
Ranking Member
House Ways and Means Committee
1106 Longworth House Office Building
Washington, D.C. 20515

Dear Chairman Camp and Ranking Member Levin:

On behalf of the Retail Industry Leaders Association (RILA), I am writing in regards to the Committee's consideration of the Save American Workers Act of 2013 (H.R. 2575) to increase the definition of a full-time employee under the Affordable Care Act (ACA). RILA, the trade association of the world's largest and most innovative retail companies, product manufacturers, and service suppliers, is committed to ensuring employer-sponsored health coverage remains a viable option for the 170 million Americans receiving coverage today. For the millions of employers committed to providing employees and their families with quality and affordable healthcare, one of the most significant challenges is the implementation of the ACA.

One of attractions to working in retail is being able to have a flexible schedule which enables you to attend a son or daughter's sports game, pick up extra shifts to pay off a car loan, or work while taking college classes. Most retailers currently use an hourly or salaried workforce designation, not full-time or part-time, which reflects an employees' desire for flexible hours and a manager's need to staff up a store during busy times. The ACA's definition of full-time as 30 hours of service per week fundamentally limits the flexibility of staffing from both the employee and store manager standpoint.

A statutory change in the ACA's full-time definition is needed to avoid disruptions in the workforce and maintain flexible work options for employees. Increasing the ACA's 30-hour per week definition for full-time status would: make it easier for employers to provide more hours to all employees, thereby increasing their incomes; help employers offer more generous health coverage to full-time employees without making premiums prohibitive; and ensure that lower-income employees have access to more affordable coverage options.

Although sharp differences in opinion about the ACA remain, people on both sides of the debate can agree that maintaining the full-time threshold many employers use today would be better for American workers and businesses than the ACA's lower full-time definition. RILA looks forward to working with you and your colleagues in Congress in a bipartisan manner to enact a change to the ACA's full-time definition.

Sincerely,

A handwritten signature in black ink, appearing to read "Bill Hughes", with a long horizontal flourish extending to the right.

Bill Hughes
Senior Vice President, Government Affairs