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Definition of Employer Under Section 3(5) of ERISA-Association Health Plans

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Definition of Employer Under Section 3(5) of ERISA-Association Health Plans

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## **Submitter Information**

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## **General Comment**

As the co-founder and director a nonprofit childcare program with 24 employees (17 of whom are full-time), we have found it impossible to find group health care coverage to offer our employees that is affordable for us and for them.

I have had conversations with several other directors at childcare programs in my community, and we have long thought that being able to "band together" as individual organizations to offer coverage to our collective employees would be a financially viable solution to the problem of the financial burden for individual small businesses to coverage to employees. This change in the rules would make that possible; we would begin exploring this option immediately. It would be an amazing thing to offer underpaid childcare teachers, who work tirelessly with our youngest citizens, an opportunity to opt for an employee-sponsored health benefit.