

# PUBLIC SUBMISSION

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

**Comment On:** EBSA-2018-0001-0001

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

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## General Comment

Anything that allows people to have access to better, affordable healthcare helps employers. Healthcare is one of the largest burdens of employers and it is also a key to negotiating in getting the best talent. People tend to work for places with better/more affordable coverage. Also, healthy workers work.

To ease this burden means small businesses, in particular, can grow by keeping more of their profit and being more competitive as an employer with larger firms. How this is set up can be tricky, but for example, the Columbus Chamber of Commerce offer a sort of group plan that sounds very similar to what is being suggested here. I works in that companies of any size buy a membership to the Chamber and as a result can be plugged into this group plan, meaning their costs are lower because they are now in a group. It has been very successful for them AND it allows it to all be run from a neutral source. As in, the companies that join do not have to rely on the

financials/results of the host company, in this case, the host (The Columbus Chamber) wants all businesses to thrive.