



March 1, 2018

U.S. Department of Labor
Employee Benefits Security Administration
Office of Regulations and Interpretations
Room N-5655
200 Constitution Avenue NW
Washington, DC 20210

Re: "Definition of Employer under Section 3(5) of ERISA-Association Health Plans"; RIN 1210-AB85 or Docket ID No. 2017-28103 (submitted electronically)

The National Association of Personal Financial Advisors ("NAPFA") is the country's leading professional membership association of Fee-Only comprehensive financial planning professionals with more than 3,200 members nationwide. Since its founding in 1983, NAPFA has embraced the high ideals of delivering independent objective financial advice in the consumer's best interest. NAPFA is committed to, and its members adhere to high professional standards including a Code of Ethics and Fiduciary Oath, which NAPFA members are required to re-affirm annually.

NAPFA applauds the Department's efforts to allow associations of all types to provide health insurance to affiliated individuals through Association Health Plans (AHPs). The Department of Labor's effort represents an important step to providing additional affordable insurance options as health care costs continue to rise while choices for coverage are on the decline. As a professional membership association, we feel well positioned to provide this offering to our constituents, since we are knowledgeable about the issues specific to this population, factors that may not be considered in the individual or small business markets.

As small business owners, many NAPFA members face ever-increasing costs for health insurance for themselves and their employees. We consistently hear about the challenges they encounter when forced to purchase insurance in the more volatile open insurance market, which tends to offer fewer choices at much higher costs. Offering an AHP affiliated with NAPFA, would allow these small businesses to combine workforces and potentially take advantage of the flexibility and lower costs that are currently available only to larger companies. This has the potential to alleviate a major issue facing these business owners committed to helping the public secure their financial futures.

An AHP could produce economies of scale that would allow an organization like NAPFA to offer more comprehensive coverage than members could afford on their own, implement realistic risk pooling, and

minimize overhead cost. However, we do believe that there is some risk in allowing AHPs to be offered by newly formed entities whose participating employers do not share any connection other than the pursuit of health insurance. Interested professional membership organizations like NAPFA, are excellent examples of the types of entities that should be able to provide this valuable service to their constituents. These organizations will not risk the relationship with their members by offering substandard insurance plans.

NAPFA understands the complexity of the issues related to AHPs and encourages the department to review the comments offered by the American Society of Association Executives when drafting the next iteration of the proposal. The association welcomes the Department's proposed regulations since we believe that AHPs can help provide access to better benefits at lower costs, especially for small businesses and individuals who have fewer choices every plan year. Access to cost effective health insurance options remains a top concern among NAPFA members. Allowing these professionals to participate in AHPs while removing unnecessary restrictions could expand their access to more affordable health care choices. We appreciate this opportunity to comment, and are willing to assist in this effort in any way we can.