

PUBLIC SUBMISSION

Received: January 07, 2018
Status: Pending_Post
Tracking No. 1k2-90sl-izay
Comments Due: March 06, 2018
Submission Type: Web

Docket: EBSA-2018-0001

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

Comment On: EBSA-2018-0001-0001

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Document: EBSA-2018-0001-DRAFT-0007

Comment on FR Doc # 2017-28103

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General Comment

The proposed expansion of employer association plans is spectacularly unwise. It will 1) undermine existing health insurance standards immediately; 2) create a "race to the bottom" for state insurance regulations; and 3) leave many Americans under-insured and in deep trouble when they have unexpected health care costs. Don't do this.