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

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General Comment

To whom it may concern,

I am writing to support the Proposed Rule: Definition of Employer Under Section 3(5) of ERISA-Association Health Plans. From a Self-Funding Medical Insurance view I cannot tell you how many times small groups have wanted to get quoted and reinsurance denies to quote because they cannot provide competitive numbers, typically due to group size. In broadening the criteria when employers may join together to form a group or association this would allow small groups easier access to creative solutions they may not normally have access to by utilizing the law of large numbers.

Example: Stop loss is not available to groups with less than 51 employees in California. It should be just as easy for an employer with 25 lives to access a creative solution as it would be for a 1000 life group. America is an amazing place because people have access to everything to help live out their 'American Dream'. Broadening the criteria would provide small employers the opportunity to work together more easily to have bigger buying power when it comes to reinsurance and basically everything purchased in the healthcare industry.

There are so many reasons this rule should be adopted, but maybe most of all it should be to continue to encourage the 'American Dream'. After all the 'American Dream' is what this country has thrived on since the day of the founding fathers.