

PUBLIC SUBMISSION

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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

Name: Garrett Talbot

Address: 285 Barlow Dr.

Idaho Falls, ID, 83401

Email: garrett@elevateinsurance.com

Phone: 702-592-7158

General Comment

To whom it may concern,

My name is Garrett Talbot and I am with Elevate Insurance LLC in the Idaho Falls, Idaho Branch. Our head quarters is located in Las Vegas, Nevada.

In the state of Idaho, AHP's are legal, but they are very hard to get through the Idaho DOI and even harder to get a carrier on board. (they are afraid of all the laws) In Nevada, AHP's are not legal in any sense since ACA inception. Nevada is a small business mecca and so it has been very hard to tell clients that its not possible to do anything for them.

I have been working with Association's for over a year now, and one of the biggest concerns coming from members is that they want an Association Health plan. Most members of Associations qualify under small group markets and these markets for health insurance are so expensive. We saw some small groups (outside of any

associations) who received 28% increases and so they just dropped coverage. It is so expensive.

Changing the definition of employer under section 3(5) of ERISA-Association Health Plans would do so much good for small business! I hope that this proposed rule does pass. I am happy to comment or answer any questions you may have. Thank you.