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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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General Comment

I work as an employee benefit consultant for one of the largest employee benefits brokerage firms in the country. Over 85% of our clients would be considered small groups. In order to obtain the scale for small businesses to achieve benefits/rates/services that large groups realize I ask you to consider expanding your geographic definition beyond multi-state metro areas to across the country(non-industry specific).

We represent small employers from all types of industries across the country. Limiting the non industry specific association to a state or multi-state metro areas does not provide enough scale to impact the risk pool. We already have state association health plans today typically within chamber of commerce settings that haven't moved the needle.

Leveraging cutting edge best policies like reference based pricing, genetic testing, RX advocacy, transparency, and shared health clinics across the country will stop and

over time reduce health spending.

The tools and expertise are available for small business to benefit from. We just need to remove geographic limitations to obtain the scale to make it work.