

PUBLIC SUBMISSION

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Docket: EBSA-2018-0001

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

Comment On: EBSA-2018-0001-0001

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

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Submitter Information

Name: Larry Weindruch

Address: 1601 Feehanville Drive, Suite 300
Suite 300

Mount Prospect, IL, 60056

Email: lweindruch@nsga.org

Phone: 2242201519

Organization: National Sporting Goods Association

General Comment

The National Sporting Goods Association, which has served the industrys retailers and dealers since 1929, sees several reasons why associations would find it beneficial to offer group health insurance to their members.

Health insurance continues to be a major cost center for American employers and individuals. These costs push investment dollars away from growing businesses and eliminate opportunities for business owners to otherwise invest in their businesses.

An overwhelming majority of Americans would like to see improvements to existing legislation as the pathway to reducing overall healthcare costs.

In theory, allowing associations to provide the opportunity to pool health insurance

for the benefit of their members could lead to better costs and outcomes.

The details and execution for such a plan are more important than the theory.

Quality healthcare with reduced insurance premiums would benefit our members, as they would be able to attract top talent to their organizations by providing an important benefit that is expected in the workplace.

We support a rule that would permit association health plans and urge the Department of Labor to create a rule that would fairly benefit employers, their employees and associations.

Sincerely,

Matt Carlson, President & CEO
National Sporting Goods Association
1601 Feehanville Drive, #300
Mount Prospect, IL 60056
(847) 296-6742

Larry Weindruch, Director of Public Affairs
National Sporting Goods Association
1601 Feehanville Drive, #300
Mount Prospect, IL 60056
(224) 220-1519