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**Via Email**

October 5, 2016

Ms. Christina Goe  
Chair, ERISA (B) Working Group

Attention: Jennifer Cook

**Re: New Section on Association Coverage for the ERISA Handbook**

Dear Ms. Goe:

Thank you for your September 19, 2016 e-mail in which you stated that the new section on Association Coverage for the ERISA Handbook is not intended to apply to excepted benefits such as disability income. As a result of the position you shared with me, companies can be confident that they can continue to offer benefits like DI to associations on a group basis.

In order to avoid the possibility that other states will construe this new section differently, I respectfully request that you make the following clarifying language change to the first sentence of the exposed language.

**"Most people have health coverage (all references herein to "health coverage," "health plan," "health insurance" or "health insurance coverage" apply only to comprehensive/major medical coverage and do not include disability income or any other excepted benefit plan) either through their employer (ERISA-covered group health plans), or by purchasing a plan directly from an insurer (individual plans)."**

I appreciate your consideration of this request. Please let me know if you would like to discuss this further.

Sincerely,

A handwritten signature in dark ink, consisting of the initials 'CP' in a cursive, stylized font.

Chris Petersen

cc: Jennifer Cook