

# PUBLIC SUBMISSION

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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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## General Comment

The simple reason healthcare is so expensive in the U.S. is lack of competition. BC/BS, United, Aetna, and Cigna dominate the group health insurer market and control pricing.

If Association Health Plans allow small employers to aggregate as "one large employer" the healthcare payment paradigm can change and costs can be reduced by as much as 30% or more.

Healthcare is very similar to energy and the stranglehold OPEC had on the U.S. for so many years. Oil costs came down as soon as there was competition for OPEC. The same will happen with healthcare. We need hundreds of companies competing for an employer's business not just 4 or 5.

For AHPs to be successful, they must be built on an ERISA platform to prevent interference from States and their insurance commissioners.

I have 27 years of experience in the healthcare field and have owned and managed a third party payer organization and a cost management company representing thousands of employers. I have also worked inside of a large hospital system and thoroughly understand the provider side of the industry. New healthcare payment paradigms will be positive for both payer and provider.

In addition to my professional experiences I have Masters Degrees in Business and Healthcare and currently serve on the board of Georgia State University's School of Healthcare Administration.

Kind Regards,

Michael C. Dendy