

# 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

Thank you for taking up this important topic. The financing of healthcare is of utmost concern to our citizens, employers and the larger healthcare system. Today, most employers are stuck with the reality of little or no information about why healthcare costs are so high. You can count on 3 fingers as to why this is happening: 1. big insurance, 2. big pharma, 3. large provider networks and their "secret" contracts with both of the aforementioned entities.

Today's employers need real solutions, not just more of the same. I fear that if independent third party administrators, fiduciary pharmacy benefit managers and narrow networks of providers are not allowed the same level playing field of the massive players in this industry then we will have the same problems stemmed from the same origins as we have today. Employers both small and large need to be able to see where their money is going, be able to negotiate for the best providers at the best

prices and pass those savings on to their members with transparency. The ONLY way to assure this is possible is through a fully transparent, self-funded platform where the members of the health plan have the ability to affect its administration through a board of directors or some other kind of voting mechanism.

I hope earnest discussion continues on this subject and the professional opinions of brokers/consultants who engage in the Health Rosetta Institute are sought after. I for one know that we cannot solve this problem using the same strategies we used when we created this problem. We need new thinking, new philosophies, new rules that help bring DOWN the cost of healthcare. Everything we've tried up to this point has had the opposite and very unfortunate effect. It must stop and It absolutely can stop. We know how to do it and we do it everyday at the grassroots level. I just hope the actions of this agency will go to support our grassroots work and further the positive outcomes we've accomplished. To hinder that good work would be devastating.