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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 am very concerned about the proposed rule entitled "Definition of 'Employer' Under Section 3(5) of ERISA - Association Health Plans." I strongly oppose the loosening healthcare coverage requirements for Association Health Plans. As a child and adolescent psychiatrist and former behavioral medical director for my county and state, I believe that the agency has an obligation to retain requirements for Essential Health Benefits in Association Health Plans. Removing the requirement to cover these essential services in Association Health Plans would severely restrict access to mental health and substance use disorder services. These benefits meet the needs of some of our most vulnerable citizens especially children and adolescents.

Prevention and early intervention is the key to better child and adolescent mental health outcomes, with 50% of all lifetime cases beginning by age 14, and 75% by age 24. Mental and substance abuse conditions also often begin suddenly. I am not referring to infrequent or rare conditions but commonly occurring ones. On the other

hand, lack of benefits for prevention and treatment is shown by research to result in higher hospitalization rates, more somatic illnesses, and a shift in costs from the healthcare sector to the sectors of justice, criminal corrections, and social services and welfare.

Thank you for consideration of my comments.

Sincerely,