

# 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

I am writing today to express serious concern about the proposed rule entitled "Definition of 'Employer' Under Section 3(5) of ERISA - Association Health Plans," which proposes to loosen healthcare coverage requirements for Association Health Plans. As a child and adolescent psychiatrist, I urge the agency to retain requirements for Essential Health Benefits in Association Health Plans. Essential Health Benefits include mental health and substance use disorder services, meeting the needs of some of our most vulnerable citizens, including children and adolescents. Prevention and early intervention is key to better child and adolescent mental health outcomes, with 50% of all lifetime cases beginning by age 14, and 75% by age 24. These conditions often begin suddenly, and health plans and insurance products should be required to treat both physical and mental health issues. Leaving the door open to removing the requirement to cover these essential services in

Association Health Plans would only serve to worsen existing difficulties in accessing mental health and substance use disorder services and harm some of the nation's most vulnerable citizens our children and adolescents.

Thank you for consideration of my comments. Sincerely, Michael Shapiro, MD