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General Comment

Association Health Plans should be severely limited and should not be created by loosely affiliated groups. As has been noted, AHPs will increase risk selection in the overall healthcare market, and with the recent repeal of the individual mandate, there is no longer a backstop against this risk. Furthermore, AHPs move the health insurance landscape backwards from the progress that has been made in recent years. These plans are not required to include cover key health services, for example chemotherapy and maternity care. In addition to the risk selection issues this creates between the AHP and broader markets, this also results in substandard health insurance being provided to those in the AHP. Consumers often do not have the detailed understanding of insurance and health risks required to fully understand what they are giving up when they select a plan that does not cover what many would expect to be standard health services. This can be catastrophic for even healthy consumers if they end up getting sick and need such services, such as chemotherapy.