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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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Comment on FR Doc # 2017-28103

Submitter Information

Name: Elizabeth Tomlinson

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 citizensour children and adolescents.

Here in New Hampshire we are struggling with the overwhelming problem of opiate addiction which affects children in a variety of ways. Children are born addicted to

opiates, they are then neglected or abused by their addicted parents or their friends. The parents frequently have repeated visits to jail and the children are sent to foster care with family or strangers who are not equipped to deal with the developmental problems these children now have. Or the parents overdose and die leaving the children with the grief and loss to deal with as well. Mental Health and substance abuse treatment for children and their families is essential to prevent and treat the sequelae of this severe problem affecting not only the citizens of New Hampshire but members of numerous communities throughout our country.

Thank you for consideration of my comments. Sincerely, Elizabeth Tomlinson MD,
child psychiatrist, Dartmouth Medical School