

# PUBLIC SUBMISSION

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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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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

I believe that Association health plans should provide the 10 essential benefits similar to what is required by law for ACA (Obamacare) policies. I am also believe that insurance companies should not be allowed to charge different rates based on gender.

The purpose of essential benefits is to provide people with preventive care when medical conditions can be detected and treated earlier when they are less expensive to treat. This reduces overall healthcare costs not only for individuals but also for insurance providers. Many of the essential benefits also provide important consumer protections from the high costs of certain medical services including outpatient care, prescription drugs, emergency room care, and more.

Prior to the implementation of ACA women paid higher premiums than men for healthcare. This was discriminatory and results in women being penalized in terms of access to fairly priced healthcare. The Penn Wharton Public Policy Initiative (<https://publicpolicy.wharton.upenn.edu/live/news/819-the-end-of-gender-rating-womens-insurance-under>) reports that men and women utilize health care services across their lifespan at about the same rates.

Association plans should follow the minimum requirements that currently are provided under the Affordable Care Act (Obamacare).