

Christopher Garmon

EDUCATION

- Doctor of Philosophy, Economics*
University of Florida, Gainesville, FL 1997
Fields: Industrial Organization and Regulation, Public Economics, Game Theory
- Bachelor of Arts, Economics*
New College of Florida, Sarasota, FL 1992

PROFESSIONAL EXPERIENCE

Assistant Professor of Health Administration, Department of Public Affairs, Henry W. Bloch School of Management, University of Missouri - Kansas City 2017–Present

- I teach the core statistics course for the Master of Public Administration (MPA) program and teach health administration electives within the MPA, MBA, and undergraduate business administration programs. All of my courses are in a blended online format.
- I conduct research on health care provider competition, medical billing, and the cost burdens faced by patients.
- Courses: Data Analysis for Health Care Managers, Economics of Health and Medicine, Health and Social Equity, Research Methods for Public Administration

Senior Consultant, Compass Lexecon 2017–Present

- I advise private and government (state and federal) clients on health care antitrust issues and investigations.

Economist, Federal Trade Commission 1997 – 2017

- I conducted microeconomic analyses of mergers and other potential antitrust violations and advised the Commission about the social costs and benefits of proposed enforcement actions
- I led teams of economists and analysts in full phase antitrust investigations and litigation support. For example, I was the lead economist in the following full phase merger investigations:
 - PinnacleHealth and Penn State Hershey (2016)
 - Capella Healthcare and Mercy Hot Springs (2013)
 - Providence Health and Spokane Cardiology and Heart Clinics Northwest (2011)
 - Dartmouth-Hitchcock Health and Catholic Medical Center (2011)
 - CSL and Talecris (2009)
 - Inova Health and Prince William Hospital (2008)
 - Piedmont Healthcare and Newnan Hospital (2007)
 - Evanston Northwestern Healthcare and Highland Park Hospital (2004)
 - Libbey and Anchor Hocking (2001)
 - Barnes & Noble and Ingram Book Group (2000)
 - Comdata and NTS and Trendar (1999)
- Served as the Bureau of Economics' primary staff-level liaison to other federal agencies and organizations on issues of health care policy and provider competition
- Helped the FTC and the Department of Justice's Antitrust Division write guidelines for the antitrust review of Accountable Care Organizations established by the Patient Protection and Affordable Care Act

- Served as the FTC's testifying economic expert in the FTC's challenge of the acquisition of Palmyra Medical Center by Phoebe Putney Health System and my analysis was cited by the Solicitor General when the case was argued before the Supreme Court
- Developed and led health care data privacy and security training for the FTC, including HIPAA compliance and the proper handling of large, patient-level datasets

Instructor, Johns Hopkins University 2002–2011
 • Course: Economics of Industry and Public Policy (Recognized for Excellence in Teaching (2007))

Visiting Assistant Professor of Economics, Kenyon College 2000 – 2001
 • Courses: Environmental Economics, Industrial Organization, Principles of Macroeconomics and International Trade, Principles of Microeconomics and Public Policy

Instructor, University of Florida 1996
 • Course: Managerial Economics

Assistant Director, Center for Economic Education, University of Florida 1996-1997
 • Led economics training programs and provided teaching materials to K–12 teachers

PUBLICATIONS AND RESEARCH

Peer Reviewed Publications

Association Between Hospital-Insurer Contract Structure and Hospital Performance, *American Journal of Managed Care*, v27 (6, June 2021), with Eric Barrette and Kevin Kennedy

Emergency Physicians Recover a Higher Share of Charges When Providing Out-of-Network Care, *Health Affairs*, v40 (4, April 2021) [pp.622-628](#), with Adam Biener, Benjamin Chartock and Erin Trish

- Media Coverage: [Healthcare Dive](#), [Wall Street Journal](#)
- Cited by the Centers for Medicare and Medicaid Services in its [Fact Sheet](#) on the Part 1 Interim Final Rule for the implementation of the No Surprises Act, July 1, 2021

Hospital Concentration and Bed Capacity, *Applied Economics Letters*, Published [online](#) ahead of print, January 17, 2021

Consumers' Responses to Surprise Medical Bills in Elective Situations, *Health Affairs*, v38 (3, March 2019) [pp.425-430](#), with Benjamin Chartock and Sarah Schutz

- Media Coverage: [Kaiser Health News](#), [Becker's Hospital Review](#)

Hospital Mergers and Antitrust Immunity: The Acquisition of Palmyra Medical Center by Phoebe Putney Health, *Journal of Competition Law and Economics*, v14 (3, September 2018), [pages 433-466](#), with Laura Kmitch

- Media Coverage: [New York Times](#)

The Accuracy of Hospital Merger Screening Methods, *The RAND Journal of Economics*, v48 (#4, Winter 2017), pages 1068-1102

One-in-Five Inpatient Emergency Department Cases May Lead to Surprise Bills, *Health Affairs*, v36 (#1, January 2017), [pages 177-181](#), with Benjamin Chartock

- Media Coverage: [New York Times](#), [Washington Post](#), [Houston Chronicle](#), [Dallas News](#), [Health-care Dive](#), [Vox1](#), [Vox2](#)

Major League Baseball's First Year Player Draft: A Natural Laboratory for the Study of Bargaining, *Journal of Sports Economics*, v14 (#5, October 2013), pages 451–470

Employer-Provided Health Insurance and Hospital Mergers, *Health Economics, Policy and Law*, v8 (#3, July 2013), pages 365–384

Hospital Mergers and Competitive Effects: Two Retrospective Analyses, *International Journal of the Economics of Business*, v18 (#1, February 2011), pages 17–32, with Deborah Haas-Wilson

- Awarded First Prize as the best published retrospective analysis of mergers by the American Bar Association, Section of Antitrust Law (2013)
- Selected as one of 20 papers to celebrate the 20th anniversary of the *International Journal of the Economics of Business* (2013)

The Use of Multiple Control Groups and Data Sources as Validation in Retrospective Studies of Hospital Mergers, *International Journal of the Economics of Business*, v18 (#1, February 2011), pages 41–44, with Deborah Haas-Wilson

Hospital Competition and Charity Care, *Forum for Health Economics and Policy*, v12 (#1, Frontiers in Health Policy Research 2009), [Article 2](#)

Economics at the FTC: Data Intensive Mergers and Policy R&D, *Review of Industrial Organization*, v29 (#4, December 2006), pages 327–348, with Michael Salinger, Keith Anderson, David Schmidt, and John Yun

A Note on Negligence and Collusion-Proof Liability, *International Review of Law and Economics*, v25 (#2, June 2005), pages 256–263

Complements Integration and Foreclosure: The Case of Joint Consumption, *Southern Economic Journal*, v70 (#4, April 2004), pages 893–890

Other Publications and Reports

Hospital Mergers - Retrospective Study to Improve Prediction, *Competition Policy International Antitrust Chronicle*, July 2017

Hospital Merger Simulation, *American Health Lawyers Association Member Briefing*, January 2014, with Keith Brand

Competition in Hospital Services: United States, Submission to the Competition Committee, Directorate for Financial and Enterprise Affairs, Organization for Economic Cooperation and Development, with Jeanine Balbach, (February 2012)

Emerging Health Care Issues: Follow-on Biologic Drug Competition, [Federal Trade Commission Report](#), with Michael Wroblewski, Elizabeth Jex, Suzanne Drennon Munck, Suzanne Michel, Alissa Wantman, and Ossie Neal (June 2009)

A Critique of the “Learning About Demand” Defense in Retrospective Merger Cases, *American Bar Association Antitrust Economics Newsletter*, (Fall 2008), pages 5–10, with David Balan

Report on Slotting Allowances and Other Marketing Practices in the Grocery Industry, Federal Trade Commission Report, with Neil W. Averitt, David A. Balto, William E. Cohen, Susan S. Desanti, and Ernest A. Nagata (February 2001)

Fundamentals of Incentive Regulation, PURC/World Bank International Training Program on Utility Regulation and Strategy, with Tracy Lewis, (June 1997)

Working Papers

Certificates of Public Advantage and Hospital Mergers: Evidence from Maine, Montana and South Carolina, with Kishan Bhatt, revise and resubmit *Journal of Law and Economics*

Current Research Projects

Estimating the Relationship Between Hospital Market Power and Hospital Prices, with David Balan, Keith Brand, and Ted Rosenbaum

The Impact of the No Surprises Act on Physician-Insurer Negotiations, with Adam Biener, Benjamin Chartock, Erin Duffy, and Erin Trish

The Economic Analysis of Generic Pharmaceutical Divestitures, with Viola Chen, Kenneth Rios, and David Schmidt

Investigating Effects of State Surprise Billing Regulations on Commercial Insurance Plan Enrollees, with Wendy Xu and Sheldon Retchin

GRANTS

Investigating Effects of State Surprise Billing Regulations on Commercial Insurance Plan Enrollees, Robert Wood Johnson Foundation's Health Data for Action (HD4A) program, 2021

Professional MBA Instructional Development Grant, Bloch Family Foundation, 2020

AWARDS

Award for Distinguished Service, FTC (2017), "In grateful recognition of your long distinguished service to the Commission and its Bureau of Economics. Your dedication to the FTC's "maintaining competition" mission, your insightful analysis of antitrust issues, and your outstanding research in the area of hospital competition have greatly helped the Commission advance the public interest."

Francis Walker Award, FTC (2013), "In recognition of your outstanding intellectual and analytical contributions to a wide range of complex economic issues arising in the Federal Trade Commission's maintaining competition mission"

Janet Steiger Team Award, FTC (2013), Phoebe Putney/Palmyra Litigation Team

First Prize, American Bar Association, Section of Antitrust Law (2013), The best published retrospective analysis of mergers

Janet Steiger Team Award, FTC (2012), Hospital Merger Litigation Team

Janet Steiger Team Award, FTC (2009), CSL/Talecris Investigation Team

Janet Steiger Team Award, FTC (2008), Inova/Prince William Investigation Team

Excellence in Teaching Award, Johns Hopkins University (2007)

Paul Rand Dixon Award, FTC (2006), “In recognition for your outstanding analytical and empirical contributions in support of FTC activity in the hospital industry”

Rafael Lusky Award, University of Florida (1994), The best first-year graduate economics student

PRESENTATIONS

The ‘No Surprises Act’ and State Surprise Billing Laws

- National Council of Insurance Legislators Conference, April 16 2021

The Financial Burden of Surprise Medical Bills

- Kansas Virtual Health Economics Conference, March 2020

Surprise Out-of-Network Medical Bills

- Next Steps in Health Reform, American University, Washington, DC, October 2019

The Benefis Healthcare Certificate of Public Advantage

- Federal Trade Commission Workshop: A Health Check on COPAs: Assessing the Impact of Certificates of Public Advantage in Healthcare Markets, Washington, DC, June 2019

Surprise Medical Bills and the Potential Impact of Legislative Proposals

- HFMA Wisconsin Spring Conference, Appleton, WI, May 2019

Hospital Merger Retrospectives and Prospective Merger Analysis

- Federal Trade Commission Hearings on Competition and Consumer Protection in the 21st Century, Hearing 13: Merger Retrospectives, Washington, DC, April 2019

Price Regulation of Monopoly Health Care Providers: The Benefis Healthcare Certificate of Public Advantage

- Missouri Valley Economic Association Conference, Memphis, TN, November 2018

Consumer Response to Surprise Medical Bills in Elective Situations

- American Society of Health Economists Conference, Atlanta, GA, June 2018
- University of Missouri Kansas City Law School Seminar, March 2018
- University of Kansas Economics Department Seminar, Lawrence, KS, February 2018
- Southern Economic Association Conference, Tampa, FL, November 2017
- Missouri Valley Economic Association Conference, Kansas City, MO, October 2017

Hospital Mergers and Antitrust Immunity, Kansas State University Economics Department Seminar, Manhattan, KS, April 2018

Health Care Competition or Regulation: The Unusual Case of Albany Georgia, International Industrial Organization Conference, Boston, MA, April 2017

Hospital Merger Analysis, National Association of Attorneys General, Health Care Working Group Webinar, January 2017

Efficiencies in Health Care Antitrust, American Bar Association/American Health Lawyers Asso-

ciation Antitrust in Healthcare Conference, Arlington, VA, May 2016

The Accuracy of Hospital Merger Screening Methods

- RAND Health, Arlington, VA, June 2016
- DC Industrial Organization Conference, Washington, DC, April 2016
- FTC Microeconomics Conference, Washington, DC, October 2014
- International Industrial Organization Conference, Chicago, IL, April 2014
- Kenyon College, February 2014

Market Definition in Horizontal Health Care Provider Mergers, American Bar Association/American Health Lawyers Association Antitrust in Healthcare Conference, Arlington, VA, May 2014

Diagnosing Retrospective Studies in Hospital Merger Enforcement, American Bar Association Webinar, April 2014

Hospital Merger Forecasting: Lessons from the Retrospectives and Next Steps, American Bar Association Retrospective Analysis of Agency Determinations in Merger Transactions Symposium, Washington, DC, June 2013

Merger Review Under the New Horizontal Merger Guidelines: Physician and Hospital Market Definition, American Bar Association Antitrust in Healthcare Conference, Arlington, VA, May 2012

The Effects of Entry in Biologic Pharmaceutical Markets, International Industrial Organization Conference, Arlington, VA, March 2012

The Role of Economic Analysis in Healthcare Antitrust: Cutting-Edge Economics Meets the Anomalies of the Healthcare System, Antitrust Practice Group Mid-Year Luncheon, American Health Lawyers Association, Orlando, FL, February 2012

Major League Baseball's Rule 4 Draft, Southern Economic Association Conference, Atlanta, GA, November 2010

Two Hospital Mergers on Chicago's North Shore: A Retrospective Study

- Southern Economic Association Conference, Atlanta, GA, November 2010
- International Industrial Organization Conference, Boston, MA, April 2009

Employer-Provided Health Insurance and Hospital Mergers

- American Society of Health Economists Conference, Durham, NC, June 2008
- International Industrial Organization Conference, Arlington, VA, May 2008
- Midwest Economic Theory Conference, Lansing, MI, April 2006

Hospital Competition and Charity Care

- Petrie-Flom Center for Health Law Policy, Harvard Law School, Boston, MA, April 2007
- American Society of Health Economists Conference, Madison, WI, June 2006

Complements Integration and Foreclosure: The Case of Joint Consumption, Southern Economic Association Conference, Washington, DC, November 2000

OTHER ACTIVITIES

Consulting Activities

Technical Advisor to the U.S. District Court for the Western District of Pennsylvania in the matter of Royal Mile Company, Inc. et al. v. UPMC and Highmark, Inc. (2:2010cv01609)

Other Teaching

The Healthcare Market, Saint Luke's Health System Executive Education, June 2018

Interviews

Are We Really Going to See the End of Surprise Medical Bills in 2022?, [Healthline](#), July 22, 2021

While Kansas Keeps Hospital Data Under Lock And Key, Colorado Helps Employers Dig Into Cost Of Care, [KCUR](#), July 2, 2021

Millions of Americans are Vulnerable to Surprise Medical Billing, [Yahoo!Finance](#), June 10, 2021

Five Questions About Surprise Medical Bills, [UMKC Today](#), February 3, 2021

Kansas Among Worst States for Surprise Medical Bills. Congress Just Banned Them, [Kansas City Star](#), December 23, 2020

Surprise Medical Bills Cost Americans Millions. Congress Finally Banned Most of Them, [New York Times](#), December 22, 2020

How a Bill that Helped Hospitals Merge Could Cost Patients, [Texas Standard](#), December 8, 2020

Health Insurers Have to Give Back 1.4 Billion and Kansans Get the Fattest Checks, [KCUR](#), October 17, 2019

MEDIC Bill Controversy Shines Light on High Ambulance Costs, [Charlotte Talks on WFAE](#), October 3, 2019

Surprise Medical Bills are Increasingly Common, Study Finds, [Medscape](#), August 13, 2019

Politicians Tackle Surprise Bills, but Not the Biggest Source of Them: Ambulances, [New York Times](#), July 22, 2019

Keeping Hospital Market Competitive is an Uphill Battle for FTC, [Bloomberg Law](#), June 6, 2019

President Trump Calls for End to Surprise Medical Bills, [KCTV5 News](#), May 9, 2019

Centene, Wellcare Union Likely to Raise Antitrust Concerns, [Healthcare Dive](#), March 29, 2019

More Than 40 Employees Laid Off From Warrensburg Hospital Trying to Cut Costs, [Fox4 News](#), February 6, 2018

Blogposts

In Through the Out Door: A Comprehensive Look at Surprise Medical Bills, [RealClearHealth](#), January 9, 2017, with Benjamin Chartock

Reference Pricing is Not a Substitute for Competition in Health Care, [FTC Competition Matters Blog](#), September 22, 2014, with Keith Brand and Martin Gaynor

Panel Moderator

The Economics of Hospital Competition, FTC Microeconomics Conference, November 2012

Personalized Medicine, FTC Microeconomics Conference, November 2011

The Role of Primary Service Area (PSA) Shares, “Another Dose of Competition: Accountable Care Organizations and Antitrust,” Federal Trade Commission Workshop, May 2011

Dissertation Committees

Alison Park iPh.D., Public Affairs/Health Informatics, UMKC

Will Duncan Ph.D., Economics, University of Kansas

Referee

American Journal of Managed Care, Annals of Internal Medicine, Economic Inquiry, Forum for Health Economics and Policy, Health Affairs, Health Care Management Science, Health Economics, International Journal of Health Economics and Management, Journal of Health Economics, Journal of Industrial Economics, Journal of Law and Economics, Journal of Political Economy, Journal of Regional Science, Journal of Regulatory Economics, RAND Journal of Economics

Reviewer of Grant or Paper Proposals

Robert Wood Johnson Foundation’s Changes in Health Care Financing and Organization Initiative

Robert Wood Johnson Foundation’s Policy–Relevant Insurance Studies

Health Affairs “Consumerism and Health” Planning Meeting, May 2018

CERTIFICATIONS

Certified in Online Teaching and Learning, UMKC Online, April 2018

Microcredential in Designing Student-Centered Courses, Association of College and University Educators, July 2021

SOFTWARE PROFICIENCY

Course Management: Blackboard, Canvas; Mathematics: Wolfram Mathematica; Presentation: MS PowerPoint; Spreadsheet: MS Excel; Statistics & Data Management: R, SPSS, Stata; Word Processing:

LaTex, MS Word; Video Editing: Panopto

MEMBERSHIPS

American Economic Association, American Society of Health Economists, Missouri Valley Economic Association