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To Whom It May Concern,

It has been brought to my attention that the OID has proposed (in HB 2466) that health insurers should be allowed to offer transitional plans in Oregon's small and large group markets (to groups with between 51 - 100 employees) through 2020. This makes me very uneasy – I'm extremely concerned about the impact of this amendment on my clients.

This proposal essentially guarantees that all small businesses will pay higher rates for their insurance: health insurers will be incentivized to keep their lowest risk groups, by offering them more favorable rates, while dumping the riskiest groups into the small group market. As a result, the market will not only be reduced in size but will also be composed mostly of higher risk lives, meaning that insurers will have to increase all rates in the small group market segment to offset the additional risk.

Please make sure that these companies (with 51 - 100 employees) cannot stay in their "pre-PPACA" or "transitional" plans – our small businesses simply cannot afford it. Thank you for your public service and for your consideration in this matter.

Regards,

Victe peister

Stand secure. Be protected.