



March 18, 2019

Chair Monnes Anderson, Members of the Senate Health Committee,

Cambia appreciates Senator Steiner Hayward's continued leadership on maternal and child welfare, however Cambia has reviewed the -1 amendments and has several concerns with the amendment as written.

In Section (3) the amendment states that the carrier must cover newborn home visits with no cost share. This would be in direct conflict with IRS laws relating to Health Savings Accounts. This issue has come up in several other benefit mandates in the recent past and High Deductible Plans connected to Health Savings Accounts we not subjected to the no cost share provisions in the past. We strongly recommend SB 526 continues with this precedent to avoid problems with the IRS.

The amendment has no specific implementation date for the home visiting program, so we assume the program would be required to be implemented January 1, 2020. Our team is already underway creating the Regence Health plans for 2020 and we are focused on meeting the rate filing deadlines in May. This program will not be ready to be included in our rate filings this spring.

It is also not practical to assume that a trained workforce would be ready to meet the demands of a statewide home visiting program as implicated in the -1 amendment. We recommend that the committee reconsider the implementation date and even test the effectiveness of the program with a pilot program in a few communities.

Finally, while we do believe that excellent maternal care can reduce the number of emergency room visits for kids, we do not believe there is enough evidence to assume that this program will be neutral or even a cost saver. We believe it will be a net increase, and since it falls outside the essential health benefits put forth in the ACA, we would consider reimbursement from the State.

We encourage the committee to consider additional amendments to SB 526 to address these concerns. Cambia looks forward to being part of future conversations about this policy proposal as we all look to improve Oregon's approach to early child welfare and development.

Sincerely,
Vince Porter
Director of Government Affairs