

April 2, 2019

Chair Andrea Salinas
House Committee on Health Care



Dear Chair Salinas and Committee Members,

I am writing today on behalf of Moda Health Plan in order to express our support for HB 3074, along with the intended amendment described in this letter, which should be addressed while the bill is under consideration by the Senate.

As we described in our comment letter dated March 21, 2019, Moda provides coverage in the small employer group and individual markets in Oregon. As part of this work, we file our premium rates annually with the Division of Financial Regulation (DFR). The intended amendment would build important flexibility into the rate review process in order to address intervening events outside of the control of insurers and the DFR. This language allows the DFR to re-open the public comment period to reconsider rates before they go into effect when an intervening event happens after the initial comment period has closed.

Oregon's individual health insurance market already experienced a need to utilize this flexibility when federal funding for cost sharing reductions (CSR) payments was discontinued. We may experience another situation in which Oregon will need this flexibility, such as if the currently pending Texas Versus U.S. case impacts the Affordable Care Act protections that support the Oregon individual market.

Thank you for this opportunity to support HB 3074 with the intended amendment described in this letter.

Sincerely,

A handwritten signature in black ink, appearing to read "Dave Nesseler-Cass".

Dave Nesseler-Cass
Chief Compliance Officer and Director, Regulatory Affairs
Moda Health Plan, Inc.



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