

February 27, 2023

The Honorable Deb Patterson
Chair, Senate Committee on Health Care
State Capitol
Salem, Oregon 97301

RE: Senate Bill 491 – Infertility Mandate

Dear Chair Patterson and members of the committee,

On behalf of Providence, thank you for the opportunity to outline our concerns regarding specific provisions of Senate Bill 491.

Providence is a faith-based, not-for-profit health system that proudly serves Oregonians as a health care provider, health plan and the state's largest private employer. As a health care provider that includes eight hospitals, 90 primary care clinics, comprehensive behavioral health services, specialty programs and research, a range of elderly services, along with palliative and hospice care – we are committed to clinical excellence. Providence is also Oregon's largest provider of obstetric services in Oregon, roughly one in five babies are born in a Providence facility each year.

Fundamental to any success in improving health outcomes is Providence's commitment to increasing access to health insurance coverage. For more than 30 years, Providence Health Plan has served Oregonians by offering coverage options in a wide range of markets. Since the implementation of the Affordable Care Act and Medicaid expansion – which Providence strongly supported – we have been committed to serving all Oregonians. With a reputation for trusted, compassionate service, we are proud to serve more Oregonians in the Individual and Family market than any other carrier. In total, Providence provides managed care services and coverage to more than 600,000 insured and self-funded plan members and government program beneficiaries.

Providence Health Plan is committed to compassionate service for all, particularly the poor and vulnerable, and is strongly rooted in our Mission and tradition – established over 165 years ago when the Sisters of Providence arrived in the Northwest from Montreal. As a Catholic-sponsored organization, Providence operates under the Ethical and Religious Directives (ERDs) for Catholic Health Care Services, which emphasize respect for the sanctity of life and provide important direction related to Catholic thought and tradition. The ERDs also provide clear instruction that Catholic institutions are not permitted to provide, or participate in, the creation, destruction, transfer, storage or other services related to embryos or in vitro fertilization services.

We are opposed to Senate Bill 491 as the bill is introduced. The bill would require all insurers to provide a wide range of fertility services, some of which place Providence in an untenable position of being in direct conflict with the ERDs. To address this conflict, Providence Health Plan respectfully

requests an exemption from providing coverage for services connected to in vitro fertilization services or any services that involve the creation, destruction, transfer, storage or other services related to embryos.

We appreciate the opportunity to express our serious concerns with Senate Bill 491 as proposed. As this bill continues to be debated, we welcome the opportunity to work with proponents to explore statutory options that provide certainty that Providence Health Plan will not be required to cover services identified in the ERDs as objectionable for Catholic healthcare organizations. Providence looks forward to working with the Chair, bill sponsors and others to address our concerns and we urge this policy committee to address this critical issue before the bill moves out of this committee.

Sincerely,

A handwritten signature in black ink, appearing to read "Don M. Antonucci". The signature is fluid and cursive, with a long, sweeping tail that extends to the right.

Don Antonucci
Chief Executive
Providence Health Plan