

What are health care sharing ministries / health care sharing arrangement plans?

- Health care sharing ministries are tax-exempt organizations in which members are supposed to follow a common set of religious or ethical beliefs and pay, or contribute a share, to cover qualifying medical expenses for themselves and other members.
- Unlike insurers, these organizations are not required to comply with consumer protections or cover essential health benefits. Ministries are primarily religiously affiliated, but people of all faiths and none unknowingly enroll in health care sharing ministries when they believe they've actually purchased an insurance product due to plans' deceptive practices.

Health care sharing ministries are poor alternatives to health insurance.

Health care sharing ministries lack regulatory oversight or coverage requirements, leading some members to get stuck with significant medical debt after receiving necessary treatment.

- Plans often exclude treatment for mental health, substance use, preventive care, and prescription drugs.
- Most plans will share costs for preexisting conditions only if the condition was cured, and a year or more has passed without symptoms or treatment (e.g., Samaritan Ministries: for heart conditions, enrollee must be symptom or treatment free for five years).
- Plans may charge more or deny membership based on pre-existing conditions (e.g., Medi-Share Christian Care Ministry: members must pay more for weight gain).
- Several plans set monthly, annual, and lifetime caps on coverage (e.g., Altrua Ministries: some have a lifetime limit of \$1,000,000 and a \$50,000 limit per calendar year).¹

Health care sharing ministries rely on deceptive practices to target consumers.

These ministries are not insurance, but are marketed like insurance, to the detriment of people's health.

- These plans are marketed alongside health insurance and brokers often receive much higher commissions for selling these plans than they receive from insurers (15%-20% commission compared to \$2.6%).²
- Health care sharing ministries train staff to use language similar to insurance terms, like 'explanation of sharing' instead of 'explanation of benefits', and 'provider fee' instead of 'copay'.³ This attempts to avoid accountability measures and a claim of plausible liability.

Health care sharing ministries are under regulated.

States are responsible for the oversight of health care sharing ministries.

- Data about health care sharing ministries is mostly self-reported by ministries, leaving states to rely on anecdotal and selective information about the number of consumers in the state who are enrolled in plans.⁴

¹Volk, J., Curran, E., & Giovannelli, J. (2018, August). *Health Care Sharing Ministries: What Are the Risks to Consumers and Insurance Markets?* Commonwealth Fund. <https://www.commonwealthfund.org/publications/fund-reports/2018/aug/health-care-sharing-ministries>

²Convey, T. (2019, February 21). Certified Agent Policies Regarding Non-Affordable Care Act Compliant Products. [Presentation]. Covered California February Board Meeting. 25. <https://board.coveredca.com/meetings/2019/02-21%20Meeting/PPT.Board%20Meeting%20Policy%20and%20Action.Feb%202019.1155.pdf>

³See Impact Health Sharing. (n.d.). *How do I explain Impact?*; or Impact Health Sharing. (n.d.). *Glossary of Terms: Basic Terms Unique to Impact Health Sharing*. Retrieved February 25, 2025, from <https://www.impacthealthsharing.com/knowledge/glossary>

⁴Government Accountability Office. (2023, July). Private Health Coverage: Information on Farm Bureau Health Plans, Health Care Sharing Ministries, and Fixed Indemnity Plans. 23-24. <https://www.gao.gov/assets/gao-23-106034.pdf>

- Courts have concluded that health care sharing ministry practices constitute the business of insurance, but no state treats these entities as insurers or regulates them as insurers.⁵

Oregon has already taken action against health care sharing ministries.⁶

- Alera was found to be selling insurance to Oregon consumers without a certificate of authority, acting as an unlicensed third-party administrator, and misrepresenting its purported health care sharing ministry products as health insurance. In response, Alera surrendered its Oregon insurance producer license and agreed to exit the Oregon market that year (2021).
- Trinity Healthshare, Inc. was fined \$60k for selling insurance to Oregon consumers without a certificate of authority and misrepresenting its purported health care sharing ministry products as health insurance. In response, Trinity agreed to exit the Oregon market that year (2021).

Increased transparency benefits Oregonians.

- According to the very limited information we have, we know that at least 10 health care sharing arrangement plans operate in Oregon.⁷ Some plans have reported a collective total of about 10,000 members in Oregon.⁸
- Oregon has no laws that would shield health care sharing ministries from regulation.⁹

Increased transparency benefits everyone.

- Basic disclosure requirements of health care sharing ministries and health insurance brokers would ensure consumers know that health care sharing ministries do not provide insurance, and empower consumers to make more informed choices.
- Greater transparency will reduce the number of individuals who mistakenly enroll in these plans and decrease the likelihood of incurring medical debt.
- State regulators will have adequate information to evaluate whether these plans' operations constitute the business of insurance, to watch for deceptive marketing, and to monitor enrollment.

H.B. 2268 will bring much needed transparency to health share ministries. The bill will require health care cost sharing arrangements to:

- Register with the Department of Consumer and Business Services;
- Report certain information to the Department of Consumer and Business Services, including enrollee, financial, operational, and marketing information;
- Clearly convey that these arrangements are not insurance and list what they cover and do not cover, among other disclosures; and
- Assess a potential enrollee's eligibility for insurance coverage, among other provisions.
- **H.B. 2268 will not prohibit health care sharing ministries from operating in the state.**

⁵Commonwealth v. Reinhold, 325 S.W.3d 272 (Ky. 2010)

⁶Oregon Department of Consumer and Business Services (2021). "Taking Action to Protect Consumers and Promote a Healthy Business Climate: Winter 2021." <https://dfr.oregon.gov/laws-rules/Documents/taking-action/taking-action-winter-2021.pdf>

⁷Division of Insurance. (2024, October). Health Care Sharing Plans and Arrangements in Colorado: Colorado House Bill 22-1269 2023 report. Colorado Department of Regulatory Agencies. 6. https://drive.google.com/file/d/1_jVANpOmfo7bvEApul_IUnRKVLEEDB5u/view

⁸Data and Statistics | Alliance of Health Care Sharing Ministries. (2025, March 25). Alliance of Health Care Sharing Ministries. <https://ahcsm.org/about-us/data-and-statistics/>

⁹Volk, J., Curran, E., & Giovannelli, J. (2018, August). Health Care Sharing Ministries: What Are the Risks to Consumers and Insurance Markets? Commonwealth Fund. <https://www.commonwealthfund.org/publications/fund-reports/2018/aug/health-care-sharing-ministries>