

May 28, 2025

**SUBMITTED ONLINE**

The Hon. Rob Nosse  
Chair, House Committee On Behavioral Health and Health Care  
900 Court St. NE, H-277  
Salem, Oregon 97301

Re: Testimony in support of H.B. 2268

Dear Chair Nosse and Committee Members:

I am writing on behalf of the FFRF Action Fund and our local advocates urging you to support House Bill 2268. The FFRF Action Fund is the lobbying arm of the Freedom From Religion Foundation, a national nonprofit organization with more than 42,000 members across the country, including more than 1,200 members in Oregon. The FFRF Action Fund advocates for the constitutional principle of the separation between state and church, and educates about nontheism.

H.B. 2268 would add much-needed transparency to the practice of Health Care Sharing Ministries (HCSMs) operating in Oregon. HCSMs are junk “insurance” products in which members who typically share religious beliefs make monthly payments to cover healthcare expenses of enrolled HCSM members. HCSMs are not considered insurance under the law, so there is no guarantee that members’ claims will be paid even for expenses that meet membership guidelines for “covered services.”

Because HCSMs are not legally required to follow the same regulations as legitimate insurance providers, they can exclude coverage for pre-existing conditions, routine care, mental health services, and even emergency procedures deemed inconsistent with their religious beliefs. Many members only realize their HCSM’s limitations when facing a significant medical expense and then discover that their bills are not reimbursed as they had expected. This lack of guaranteed coverage can create financial and emotional stress, especially for those who believed

they were part of a reliable safety net. But don't just take our word for it; Last Week Tonight with John Oliver showed how HCSMs are causing harm to thousands of Americans who think they are getting coverage but are actually being deceived.<sup>1</sup>

While members are left with mounds of unpaid medical debt, HCSMs have exploited the lack of regulatory oversight, religious exemptions, and the escalating costs of traditional healthcare to amass substantial profits. This has allowed them to operate with minimal regulatory scrutiny while benefiting from favorable tax policies and exemptions.

These factors have enabled some HCSMs to generate significant revenue. For example, Christian Healthcare Ministries, a prominent HCSM, reported a substantial revenue of \$340 million in its 2017 tax filing.<sup>2</sup> Similarly, Liberty HealthShare, another major player in the HCSM sector, experienced a staggering 900 percent surge in revenue between 2015 and 2017,<sup>3</sup> with its revenue escalating from \$6.5 million to \$65 million within just two years. These drastic increases in revenue come as these HCSMs continue to deny basic medical coverage.

H.B. 2268 would go a long way toward protecting HCSM members. Full transparency, as required by the legislation, would allow potential HCSM members to know exactly what they're signing up for. It would also afford them insights into information such as the plan's denial rate, denial reasons, and the dollar amount that was paid in reimbursements the year prior.

Please vote to advance this bill to ensure the protection of Oregonians who wish to use HCSMs to pay for their medical care.

Sincerely,



Ryan Dudley  
State Policy Manager

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<sup>1</sup> Available at <https://www.youtube.com/watch?v=oFetFqrVBnc>.

<sup>2</sup> [www.beckerspayer.com/payer/healthcare-sharing-ministries-revenue-members-and-complaints-surge.html](http://www.beckerspayer.com/payer/healthcare-sharing-ministries-revenue-members-and-complaints-surge.html).

<sup>3</sup> [www.beckerspayer.com/payer/healthcare-sharing-ministries-revenue-members-and-complaints-surge.html](http://www.beckerspayer.com/payer/healthcare-sharing-ministries-revenue-members-and-complaints-surge.html).