



## Senate Health Care Committee

### Testimony in Opposition to SB 165

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Chair Monnes-Anderson, Vice Chair Kruse and members of the Senate Health Care Committee, thank you for the opportunity to briefly share our concerns regarding SB 165.

We believe there are sections of this bill (specifically Section 3) that are redundant with the language in HB 2240 – the Oregon Insurance Division’s (OID) technical bill that will align Oregon with federal requirements as a result of the Affordable Care Act (ACA). As such, this language is unnecessary.

More importantly, the bill establishes caps on annual cost-sharing for *all health services provided by a health benefit plan*, beyond what is outlined in the ACA, which establishes cost sharing limits only for the Essential Health Benefits and allows adjustment annually, based upon a set of guidelines. If Oregon were to pass this legislation, it would, 1) be administratively challenging, as the statute would expectedly have to be revised annually to accommodate actuarial value limits established through ACA, 2) it would significantly alter the assumptions, models and products carriers have been developing in order to be in compliance with the ACA and; 3) it would also have a negative impact on affordability of premiums.

We’d like to remind the Committee that the OID and health insurance carriers have been actively engaged around the establishment of cost-sharing methodology and health benefit plan benefits for the past couple of years and we do not believe there is a demonstrated need for a fixed cap amount on non-Essential Health Benefits at this time.

As with all other bills you are considering that are not a direct requirement of federal or state healthcare reform, we strongly urge you to “press pause” and allow the substantial changes that are already underway – to be fully implemented and evaluated for early outcomes.

Thank you