



February 16, 2015

The Honorable Mitch Greenlick  
Chair, House Committee on Health Care  
State Capitol  
Salem, Oregon 97301

RE: House Bill 2468, Network adequacy

Dear Representative Greenlick and members of the committee:

On behalf of both Providence Health Plan and Providence Health & Services, thank you for the opportunity to provide our input regarding House Bill 2468, as it relates to network adequacy.

Providence appreciates the hard work of the Oregon Insurance Division over the interim to bring together a diverse group of stakeholders. HB 2468, with the adoption of proposed amendments, generally aligns with the negotiations reached in that work group. In addition, Providence would recommend the following changes to address a few remaining inconsistencies.

**Clarify regulatory authority over insurance exchange plans**

Current language seems to indicate that the "Oregon Health Insurance Exchange Corporation" has some regulatory authority over network adequacy; this language should be removed. It is our understanding that the Centers for Medicare & Medicaid Services will regulate ECP standards for exchange plans. In circumstances where this is not true, oversight and regulation of network adequacy should be consolidated with the Oregon Insurance Division for purposes of consistency.

**Clarify which plans network adequacy rules pertain to**

The intent of this legislation is to ensure network adequacy for individual and small group plans. Providence would suggest clarifying this intent by reworking language in Section 2 to read:

- (1) An insurer offering a health benefit plan to individuals or small employers in this state that provides coverage through a specified network of health care providers shall:
  - (a) With respect to each individual or small employer health benefit plan...

Providence appreciates your consideration and the opportunity to provide input on House Bill 2468.

Sincerely,

A handwritten signature in black ink that reads "Carrie Smith". The signature is written in a cursive, slightly slanted style.

Carrie Smith  
Chief Compliance Officer  
Providence Health Plan