

Providence Health Plans
P.O. Box 4327
Portland, OR 97208-4327
www.providence.org/healthplans



February 8, 2017

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

RE: HB 2341 – DCBS Affordable Care Act reconnect

Dear Representative Greenlick and members of the committee:

On behalf of Providence Health Plan, we want to express our appreciation to the Division of Financial Regulation, Department of Consumer and Business Services for providing an opportunity to weigh-in on these proposed changes over the interim. The Division has been notified of the following concerns and we look forward to further discussion before this legislation moves forward.

Section 6. Payment, coverage and reimbursement for hearing aid – We believe that no change is needed to this statute in order to align with current federal law. DFR policy staff have informed us that that the changes in Section 6 will be removed via amendment.

Section 7. Adverse benefit determinations - Providence appreciates the Division's desire to reinforce consumer protections as they relate to mental health parity, but the proposed changes appear to mix separate standards in existing mental health parity laws and confuse existing standards and processes related to adverse benefit determinations. While there has been some variance in how carriers have implemented mental health parity laws, this language does not relate to those variances. Furthermore, the Division has remedied those issues by providing clarity on benefits administration requirements through guidance, rulemaking and years of continuous market conduct activity. We are engaged with discussions with DFR staff on this subject in order to reach a shared understanding regarding the problem to be solved and agreement on any alternative language that may be necessary.

Thank you for the opportunity to provide our comments; we look forward to further discussion with the division on this subject.

Sincerely,

A handwritten signature in black ink, appearing to read "Aaron Bals", with a long horizontal flourish extending to the right.

Aaron Bals
Sr. Director - Regulatory Affairs
Providence Health Plan