

March 21, 2019

Chair Andrea Salinas  
House Committee on Health Care

Dear Chair Salinas and Committee Members,

I am writing today on behalf of Moda Health Plan in order to express our support for HB 3074, along with the intended amendments described below.

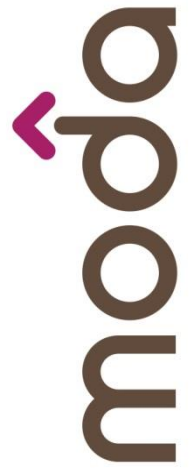
Moda provides medical coverage in both the small employer group and individual markets in Oregon. As part of this work, we file our premium rates annually with the Division of Financial Regulation (DFR). We appreciate this opportunity to work with the DFR to propose changes to simplify and strengthen the rate review statute in Oregon.

We support HB 3074 with the intended amendments discussed with DFR staff, as it would both simplify the review process by allowing DFR to reduce the number of steps in the process, and also builds in important flexibility related to intervening events outside of the control of insurers and the DFR. This language regarding intervening events allows the DFR to re-open the public comment period to reconsider rates before they go into effect when an intervening event happens after the initial comment period has closed.

Oregon's individual health insurance market already experienced a need to utilize this flexibility when federal funding for cost sharing reductions (CSR) payments was discontinued. Continuing with previously approved rates in a situation like this would have been extremely problematic for the market as the rates would no longer be adequate for the population served.

We may experience another situation in which Oregon will need this flexibility, such as if the currently pending Texas Versus U.S. case impacts the Affordable Care Act protections that support the Oregon individual market. In such a situation, the DFR needs flexibility to re-open the process and reconsider rates in light of the change.

Thank you for this opportunity to support HB 3074 with the intended amendments described in this letter.



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Sincerely,

A handwritten signature in black ink, appearing to read "Dave Nessler-Cass". The signature is fluid and cursive, with a long horizontal stroke at the end.

Dave Nessler-Cass  
Chief Compliance Officer and Director, Regulatory Affairs  
Moda Health Plan, Inc.

