



February 7, 2022

The Honorable Rachel Prusak
Chair, House Health Care Committee
State Capitol
Salem, Oregon 97301

RE: House Bill 4006 – Naturopathic physician payment parity

Dear Representative Prusak and members of the committee:

Providence Health Plan is committed to ensuring that Oregonians have access to high-quality, affordable health care. Providence Health Plan partners with our providers to create networks that are high-quality, affordable, and responsive to the needs of our members and the communities we serve.

Providence Health Plan recognizes and appreciates the role Naturopathic physicians (ND) play in the care continuum, but we oppose any policy that would compromise our ability to create and maintain quality provider networks in a cost-efficient manner. For this and the reasons stated below, Providence opposes this bill.

Payment parity should reflect differences in populations served and scope of services.

Insurers are permitted to vary reimbursement rates among providers to reflect differences in licensure type, education, training, and geographic area served. This practice is appropriate to ensure that we have sufficient high-quality providers to meet the needs of our members. NDs perform many of the same services as MDs, however, the license types are not exact equivalents. MDs have additional training in the form of residency requirements that are not required for ND licensure. Therefore, reimbursement rates should be able to reflect this difference to ensure that we are able to attract and retain high-quality MDs throughout the state.

Providence Health Plan members seen by naturopaths have 13.6% lower acuity and receive 30% fewer guideline-based cancer screenings. Mandating fee for service payment rates that fail to account for patient complexity or the comprehensiveness of care our patients require would contravene any efforts to provide services in a cost-effective manner and result in health insurance premium increases for several reasons.

The proposed legislation is contrary to the State's goal to contain health care costs.

The parity requirement will increase provider reimbursement and therefore the overall cost of care. HB 4006 conditions the receipt of payment parity for NDs on the rendering of services on a fee for service basis. This provision would impede the efforts of insurers to move towards value-

based care and alternative payment methodologies by creating a perverse incentive for NDs to continue to bill on a fee for service basis.

Thank you for the opportunity to provide comments and we look forward to further discussion.

Sincerely,

A handwritten signature in black ink, appearing to read 'R. Gluckman', written in a cursive style.

Robert Gluckman, M.D., MACP
Chief Medical Officer for Providence Health Plans