



March 15, 2023

Rep. Rob Nosse, Chair  
Behavioral Care and Health Care Committee  
Oregon State Capitol  
Salem, Oregon 97301

**RE: HB 2555 Letter in Opposition**

Dear Chair Nosse and Committee Members,

Thank you for the opportunity to provide comments on **HB 2555** which pertains to reimbursement of services provided by naturopathic physicians. Moda Health would like to express our opposition to

**HB 2555**. The major concerns we have with this bill are outlined below:

- Federal and state law currently prohibit discrimination against providers practicing within the scope of their license, and so no change is needed to existing requirements.
- Moda does not discriminate against providers with regard to coverage or participation in our plans. A service that is covered under one of our plans is covered from any provider licensed to provide that service. We will allow any licensed provider onto our network, so long as our credentialing and contracting requirements are met.
- Providers such as Naturopathic physicians can join our networks, as long as our participation requirements are met, and can provide covered services under our plans.
- We utilize various criteria when establishing reimbursement rates, consistent with current law. Payers must retain the ability to establish reimbursement rates through value-based reimbursement arrangements and other methods that support delivery of high-quality services but also consider economic factors such as a provider's education, expertise, and market expectations.
- Establishing requirements to apply reimbursement rates uniformly reduces payers' ability to meet healthcare cost growth objectives, which benefit all Oregonians.

Again, thank you for the opportunity to comment on this proposed legislation and for taking for taking our concerns with **HB 2555** into consideration as you deliberate this bill.

Sincerely,

Erica Hedberg  
Director, Government Programs



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