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February 11, 2025

The Honorable Rep. Robert Nosse  
Chair, House Committee on Behavioral Health and Health Care  
State Capitol  
Salem, Oregon 97301

**RE: HB 2959 -- Relating to Infertility**

Dear Chair Nosse and members of the House Committee on Behavioral Health and Health Care,

Providence Health Plan (PHP) appreciates the opportunity to review and provide comment on House Bill 2959, relating to infertility coverage.

PHP is part of Providence Health & Services, a faith-based, not-for-profit network of hospitals, health plans, physicians, clinics, home health, and affiliated services that proudly serves Oregonians. Established more than 165 years ago when the Sisters of Providence arrived in the Northwest from Montreal, Providence, as a Catholic-sponsored organization, is driven by a belief that health is a human right. We are committed to understanding and responding to the needs of the many communities we serve and to providing high-quality, equitable health care for all. We have a special focus on serving those who are vulnerable or marginalized, including people who rely on Medicaid coverage for access to care.

Fundamental to Providence's goal to improve health outcomes for all, PHP has served Oregonians for more than 40 years by offering a wide range of coverage options across the state. With a reputation for trusted, compassionate service, PHP is proud to support Oregonians in accessing quality health care across all major medical coverage types including Medicare, Medicaid, and commercial insurance.

As a Catholic-sponsored organization, Providence operates under the Ethical and Religious Directives (ERDs) for Catholic Health Care Services, which provide direction for Catholic thought and tradition, emphasizing respect for the sanctity of life. Specifically, the ERDs provide clear instruction that Catholic institutions are not permitted to provide or participate in the creation, destruction, transfer, storage, or other services related to embryos or in vitro fertilization services.

Although PHP covers some infertility benefits for our members, HB 2959 requires coverage of several benefits that contradict the ERDs under which we operate. To address this conflict, Providence respectfully requests a narrow exemption from providing coverage for services connected to in vitro fertilization services or any services that involve the creation, destruction, transfer, storage, or other services related to embryos. Such an amendment would also incorporate existing Department of Consumer and Business Services market equity fee requirements to ensure that any exemption for Providence would not create a favorable cost position relative to other insurers in the market. The amendment would also provide mechanisms to ensure PHP members have access to the services mandated in the legislation. Both of these provisions have existing precedent in Oregon.

We appreciate the opportunity to express our concerns with HB 2959, as introduced. We welcome the opportunity to work together with the Chair, bill sponsors, and others to address these concerns.

Sincerely,



Don Antonucci  
President & Chief Executive Officer  
Providence Health Plan