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January 30, 2023

Tashia Sizemore
Life and Health Program Manager
Insurance Product Regulation and Compliance Section, Division of Financial Regulation
Oregon Department of Consumer & Business Services
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SENT VIA EMAIL

RE: Response to Targeted Market Conduct Examination Report Providence Health Plan

Dear Ms. Sizemore,

Providence Health Plan (PHP) is committed to facilitating access to high quality reproductive health care for its members and the communities it serves, while responsibly stewarding member premium dollars. These commitments guided our interpretation of Oregon's Reproductive Health Equity Act (RHEA) and applicable federal laws, as well as our participation in this market conduct examination. This is evidenced by the fact that the sole finding in PHP's report relates to its good faith interpretation of the scope of RHEA, rather than any lack of effort to implement and follow the law.

Oregonians are best served when there is sufficient rulemaking and guidance to allow carriers to conform to regulator expectations, which in turn results in consistent health insurance coverage, regardless of carrier. If carriers do not conform with rules, it is then appropriate for them to be corrected through findings of violations and for impacted Oregonians to be made whole, where appropriate. Here, findings were issued before rulemaking or guidance. The result has been a great deal of regulator and insurer time and resources being spent without any greater consistency yet achieved for the coverage provided to Oregonians under RHEA.

We appreciate that the DFR's final report demonstrates that the areas of disagreement between PHP and DFR are narrow and limited. The parties agree that more work is needed to define the meaning of the term "screening" as it is used in RHEA as well as the scope of services subject to RHEA and in what circumstances. PHP encourages the DFR to engage with the carriers to establish a common understanding of the coverage requirements set forth by RHEA. PHP continues to believe that the rule-making process is the best way to achieve this shared goal. We look forward to discussing RHEA and how future examinations can be most effective.

Sincerely,

A handwritten signature in black ink, appearing to read "Aaron Bals", written over a horizontal line.

Aaron Bals
Chief Compliance and Risk Officer
Providence Health Plan