



Regulatory Affairs

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Reply to:

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Gayle Woods

Senior Policy Advisor

Division of Financial Regulation

350 Winter Street NE

Salem, OR 97309

VIA E-Mail: ins.rules@oregon.gov

RE: Cambia Comments on Rulemaking Establishing Network Adequacy Standards in Oregon

Dear Ms. Woods:

Thank you for the opportunity to comment on the proposed rules regarding network adequacy standards for Oregon health benefit plans and annual network reporting requirements. Cambia Health Solutions represents six health plans in four states, providing health insurance to more than 2 million people. We appreciate the time and thoughtful effort the Division of Financial Regulation (DFR) put into drafting the proposed rules and we support the draft language as currently written with one suggestion regarding review criteria.

In the 2017 Letter to Issuers in the Federally-Facilitated Marketplaces, the Centers for Medicare & Medicaid Services (CMS) issued criteria it will use as part of the network adequacy review process when certifying compliance with federal network adequacy standards. Cambia requests the DFR implement these standards of review into the proposed rulemaking to establish a consistent review standard for all network adequacy enforcement actions taken on health benefit plans in Oregon. It is imperative the DFR use one consistent standard of review for all health issuers. Should the DFR determine an issuer's network is inadequate under the reasonable access review standard, the issuer should be provided an opportunity to engage in the justification process similar to the process utilized by CMS for federal review. This process will allow issuers to address how the reasonable access standard is met despite an initial finding inadequacy. Issuers should be granted the opportunity to detail patterns of care and other relevant information that explains why the issuer provides reasonable access to enrollees in the identified areas.

Again, Cambia appreciates the opportunity to comment on the proposed rulemaking and we commend the rulemaking committee for all their efforts.

Sincerely,

Jennifer Baker

Oregon Regulatory Affairs

Cambia Health Solutions

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