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RE: Administrative Rules to Implement HB2468 – Network Adequacy Requirements

Fresenius Kidney Care supports the network adequacy requirements for insurers in the individual and small group market as outlined in the Factor-Based Evidence of Network Adequacy Requirements established by HB2468. Fresenius Kidney Care operates 40 outpatient dialysis facilities in Oregon, caring for over 2,400 individuals with kidney failure. Kidney failure is a health condition that, without treatment, results in death within weeks. According to the United States Renal Data System's most recent 2014 Annual Report, over 5,700 people in Oregon have kidney failure, which is a 35% increase in the past decade. An adequate network of dialysis facilities will ensure access to care for this growing population which must rely on dialysis or a kidney transplant to sustain life.

We are pleased to see two nationally recognized standards - the federal network adequacy standards applicable to Medicare Advantage plans and the federal network adequacy standards applicable to Qualified Health Plans - which insurers must use to demonstrate compliance with network adequacy requirements. Because dialysis is required a minimum of three times a week on an ongoing basis, geographical proximity of treatment services is especially important for this vulnerable population that relies on dialysis treatment for their lives.

Thank you for the opportunity to comment on these proposed rules.

Best regards,

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