

July 7, 2015

Laura Cali
Oregon Insurance Commissioner
Department of Consumer and Business Services
P.O. Box 14480
Salem, OR 97301-3883

Dear Commissioner Cali,

Thank you for the opportunity to comment on the proposed rules for establishing network adequacy standards. Moda Health offers individual, small group and large group health plans in Oregon and is therefore directly impacted by these rules. We understand that consumers need adequate access to in-network providers and well-designed directory tools that help them clearly understand their health plan network. We participated actively in the rulemaking advisory committee for these proposed rules and appreciate the efforts of the Division of Financial Regulation (DFR) to craft rules that respect the input provided by the advisory committee.

Moda Health is supportive of the proposed rules as written. The rules establish a solid basis for network adequacy regulation that is both protective of consumers and operationally feasible for issuers. The rules are also well designed to align with the network adequacy requirements of The Centers for Medicare and Medicaid Studies (CMS), which are in a state of evolution. In the future, this alignment will allow the DFR and issuers to leverage CMS requirements rather than attempting to duplicate or supplant them. The alignment with CMS requirements should also alleviate the need to modify these rules in the foreseeable future.

Thank you again for the opportunity to provide input on these rules. Should you have any questions, please contact me.

Respectfully,

Dave Nessler-Cass

Director, Regulatory Affairs

