



Regulatory Affairs

Antoinette Awuakye

(503) 553-1521 Voice

(503) 225-5431 Facsimile

antoinette.awuakye@cambiahealth.com

Reply to:

P.O. Box 1271 (M/S E12B)

Portland, OR 97207-1271

August 4, 2025

Lily Sobolik

Senior Policy Analyst

Department of Consumer and Business Services, Division of Financial Regulation

P.O. Box 14480

Salem, OR 97309

SENT VIA EMAIL

RE: Comments on Draft Rules Implementing SB 831 (2025) – Updated NAIC Accreditation Standards: Submission Date

Dear Ms. Sobolik:

Thank you for the opportunity to provide comments on the draft rules implementing SB 831 (2025), which adopts the updated NAIC accreditation standards (Models #440 and #450).

Cambia Health Solutions, which operates Regence BlueCross BlueShield of Oregon (Regence) and BridgeSpan Health plans is a not-for profit health insurer dedicated to improving the health and well-being of our members and the communities we serve. As the state's largest health insurer, we provide high-value, affordable health care to nearly one million Oregonians across a network of 39,000 providers at 705 sites across the state. In keeping with our values as a tax-paying nonprofit, 90% of every premium dollar goes to pay our members' medical claims and expenses.

During the first Rule Advisory Committee (RAC) meeting on July 23, 2025, you confirmed that the effective date of the rules will be January 1, 2026, and with respect to the annual group capital calculation, it will apply to carriers beginning with 2026 data that will be submitted in 2027. Based on our operational experience with various regulatory financial reporting requirements, we respectfully recommend an **annual** August 1 submission date, with July 1st as the earliest feasible alternative.

Thank you for your consideration of our comments and your continued collaborative approach to regulatory development.

Sincerely,

A handwritten signature in blue ink that reads "A. Awuakye". The signature is fluid and cursive, with the first letter of the first name being a large, stylized capital 'A'.

Antoinette Awuakye

Sr. Public and Regulatory Affairs Specialist