

October 14, 2025

Lily Sobolik
Senior Policy Analyst
Department of Consumer and Business Services, Oregon Division of Financial Regulation
350 Winter Street NE
Salem, OR 97301
Submitted via email

Re: Comments on proposed regulation NAIC accreditation standards (SB 831)

Dear Ms. Sobolik,

Kaiser Foundation Health Plan of the Northwest appreciates the opportunity to provide feedback to the Oregon Division of Financial Regulation (DFR) on the NAIC accreditation standards implementing SB 831 (2025). Kaiser Permanente Northwest is an integrated health care system that covers and cares for Oregonians. We are committed to delivering affordable, coordinated, and high-quality care and coverage that supports not only our members but also the communities we serve.

The proposed regulation focuses on the group capital calculation and liquidity stress test that carriers will need to conduct and report to the DFR. During the legislative process, carriers were assured that the timing of the reporting would be addressed via the rulemaking process. The proposed regulation, however, does not provide clarity on the date of the initial submission and which year of data will be captured in the initial report. As described below, we respectfully request that DFR revise the proposed regulations to clarify that the initial submission is due on August 1, 2027 based on 2026 data, with subsequent annual submissions due on August 1.

We understand that the reporting will have an annual cadence and that the DFR plans to include the deadlines in the document that lists the other statutory filing requirements. However, if the proposed regulation does not include a specific sentence about the initial filing, then the regulation could be read to require initial reporting in the same calendar year that the regulation becomes effective.

During the rulemaking advisory committee process in July, there was a discussion that the initial reporting would take place in 2027 and be based on 2026 data. However, we note that the regulation does not provide this level of detail. Rather, the proposed regulation indicates that the filing instructions and cadence of filing will be posted on the DFR website. Please add clarifying language to the regulation so that carriers will have certainty about the timing and data content of the initial report submission.

The group capital calculation and liquidity stress test reports are complex and will require significant time and resources to prepare. These reports will involve coordination across multiple teams and functions and will require new processes and procedures to be put in place. Requiring submission earlier in the year would place a substantial burden on carriers during a period already constrained by year-end financial close, issuance of the annual statement, audit activities, and other statutory filings all due within the first five months of the year. To support effective implementation, ensure data quality, and limit operational burden, we recommend aligning the annual due date for these reports with the deadline for the Own Risk and Solvency Assessment (ORSA) report, which is due by August 1. Additionally, having the first report due in 2027 after the regulation's effective date of January 1, 2026, would allow carriers sufficient time to prepare operationally for this new requirement.

Thank you for considering our feedback. We appreciate the Division's efforts to ensure a thoughtful and transparent implementation of SB 831. Please do not hesitate to contact us with questions.

Sincerely,

A handwritten signature in black ink that reads "Merlene Converse". The script is cursive and fluid.

Merlene Converse

Government Relations Consultant IV

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