



April 1, 2022

TO: Lisa Emerson, DCBS
FR: Maribeth Guarino, Oregon State Public Interest Research Group (OSPIRG)
RE: Association Health Plans RAC

Thank you for the opportunity to provide feedback on the rules for Associated Health Plans on behalf of OSPIRG and consumer voices. We believe these rules to be generally reflective of consumer interests; more bargaining power will allow associations more leverage to lower health care costs for themselves and their employees. There are adequate protections to ensure that these plans provide an appropriate level of health coverage (essential health benefits) so that smaller employers or members of the association and their employees are not left behind. There are no other glaring consumer issues in this rulemaking draft, and we believe that the definitions and other language in these rules are acceptable in their current form.