



November 17, 2025

Oregon Division of Financial Regulation
Department of Consumer and Business Services
350 Winter St. NE
Salem, OR 97301
Attn: Brooke Hall

Subject: Moda Health Comments on Network Adequacy Requirements, Senate Bill 822

Moda Health Plan, Inc. (Moda) appreciates the opportunity to provide comments to the Department of Consumer and Business Services' (DCBS) Division of Financial Regulation (DFR) efforts to adopt rules to implement Senate Bill 822 (2025), Network Adequacy Requirements. In this letter, Moda is providing feedback and suggestions regarding the proposed Network Adequacy Template for use in 2026 for plan year 2027.

1. Reporting Info Tab

- Based upon conversations during the RAC meetings, Moda recommends changing "Health benefit plan name" to "Network Name"

2. Time and Distance Tab

- Moda recommends removing the column titled "# of Enrollees Meeting CMS Travel Time Standards". Instead, Moda recommends using the CMS methodology of a secret shopper survey or other type of survey which allows for a statistically valid sample of the provider network to be reported.
- Moda would like clarification of the intent of the column titled "# of Enrollees with Telemedicine Access Only". The data in this column would essentially be the number of enrollees that don't have access to a provider within the time and distance standards, if there is a telehealth provider available of that specialty anywhere within the service area.

3. HPSAs and Low-Income Zip Codes Tab

- Moda recommends removing the "Wait Time Standard Not Met" column. If issuers are utilizing the Federal methodology, it would be based upon a sample with a percentage of responses.

4. Providers Tab

- Moda recommends removing the "Appointment Availability" column. Collecting and maintaining this availability for all providers is a large administrative burden with no clear benefit as the data would change on a daily basis. Issuers would have to hire additional staff to support such a large outreach effort, and providers would be burdened with every health plan calling their offices requesting this information.

Health plans provided by Moda Health Plan, Inc.

Thank you for the opportunity to provide comments during this rulemaking process.

Sincerely

A handwritten signature in cursive script that reads "Scott White".

Scott White
Director, Regulatory Affairs

