



Regulatory Affairs

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Reply to:

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April 24, 2026

Brooke Hall

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 No. 2 - Network Adequacy Reporting Template Beginning in 2027

Dear Ms. Hall:

I am writing on behalf of Cambia Health Solutions (Cambia Health), which operates Regence BlueCross BlueShield of Oregon (Regence) and BridgeSpan Health plans. Cambia Health 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.

Thank you for the opportunity to comment on the second draft of the Network Adequacy Reporting Template, as well as the Data Template Q&A discussed at the April 8, 2026 Rule Advisory Committee (RAC) meeting. We are submitting our feedback from that meeting in writing. Our comments focus on the Reproductive Health – Provider Specialty Type List. Additionally, per your request, we are including a sample geospatial access report reflecting the format we recommended the Division of Financial Regulation (DFR) adopt for its geospatial analysis reporting.

Reproductive Health – Provider Specialty Health

At the April 8 meeting, we requested that the DFR clarify which provider types fall under the "Reproductive Health" category. For example, the DFR could provide a list of licensures (OB-GYN, Urology, Adult Medicine etc.) that fall under the Reproductive Health Equity Act (RHEA). Greater specificity would enable insurers to accurately identify reportable providers and ensure the DFR receives complete and consistent data. Without clear guidance, each insurer would be left to independently determine which provider types qualify as delivering "reproductive health" services, a gap that could lead to significant inconsistency in reporting across carriers.

You noted that the Oregon Health Authority (OHA) maintains a list of reproductive health care provider types; however, we were unable to locate this list on the OHA's website. We respectfully request that the OHA list be shared with RAC members prior to the next meeting so that we can review in advance and provide feedback at the meeting.



Sample of Geospatial Access Report

Please find attached a sample of the geospatial analysis report that we submit annually to the Washington Office of the Insurance Commissioner (WA OIC) to demonstrate network adequacy for our commercial networks. For brevity, this sample reflects a single specialty and a single county. A complete report would include a dedicated page for each specialty and county within a given network making this sample very long. We respectfully request that the DFR consider adopting this format following careful review.

Thank you again for the opportunity to provide comments. We appreciate the Department's collaborative approach to developing a workable reporting template through this stakeholder process and look forward to continued engagement.

Sincerely,

A handwritten signature in blue ink, reading "A. Awuakye". The signature is fluid and cursive, with the first letter "A" being particularly large and stylized.

Antoinette Awuakye
Sr. Public and Regulatory Affairs Specialist

Network Accessibility Analysis

Regence BlueCross BlueShield of Oregon Individual Connect Network

April 9, 2026

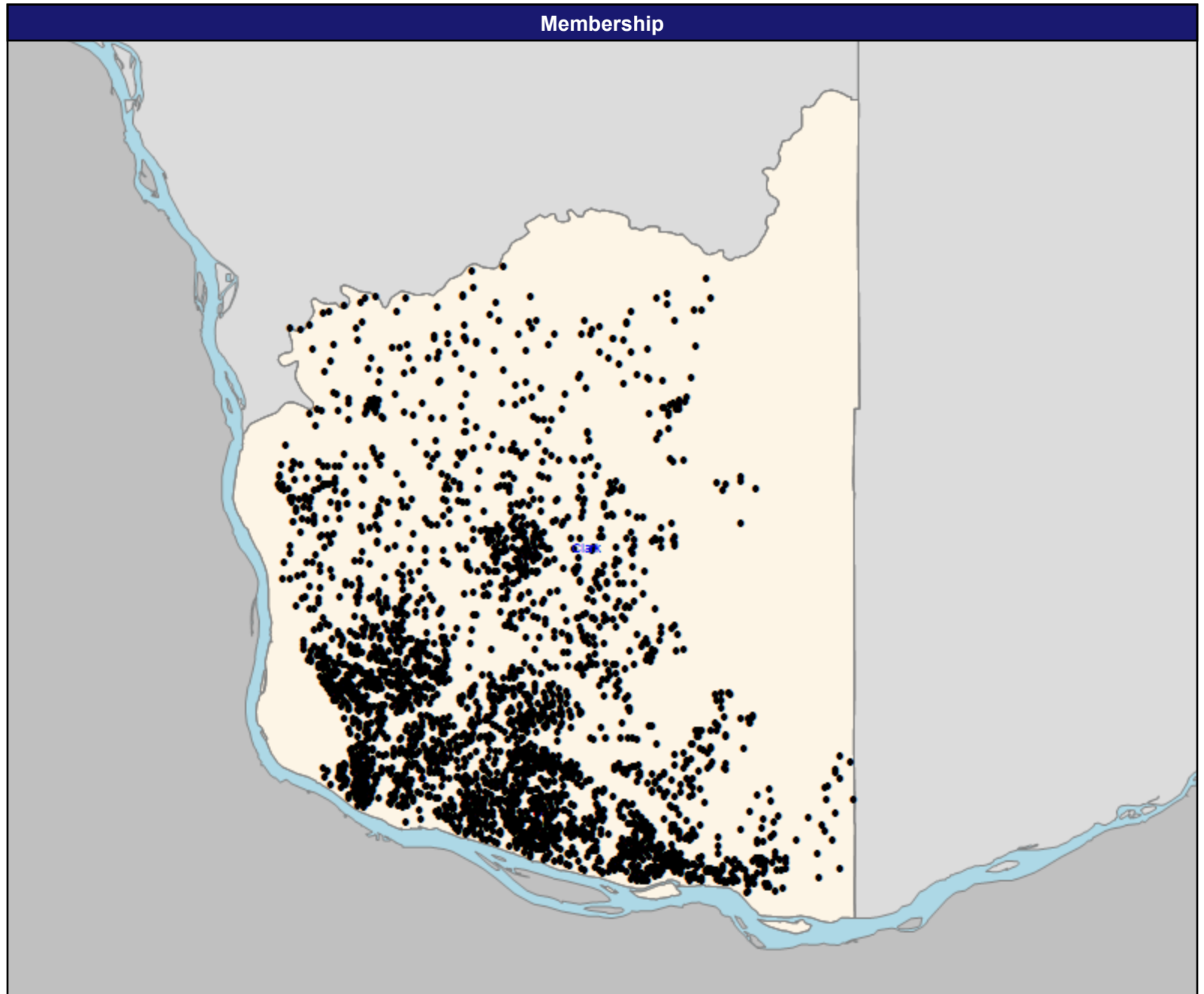
Member Map

April 9, 2026

Urban

3,082 member locations

- All Members



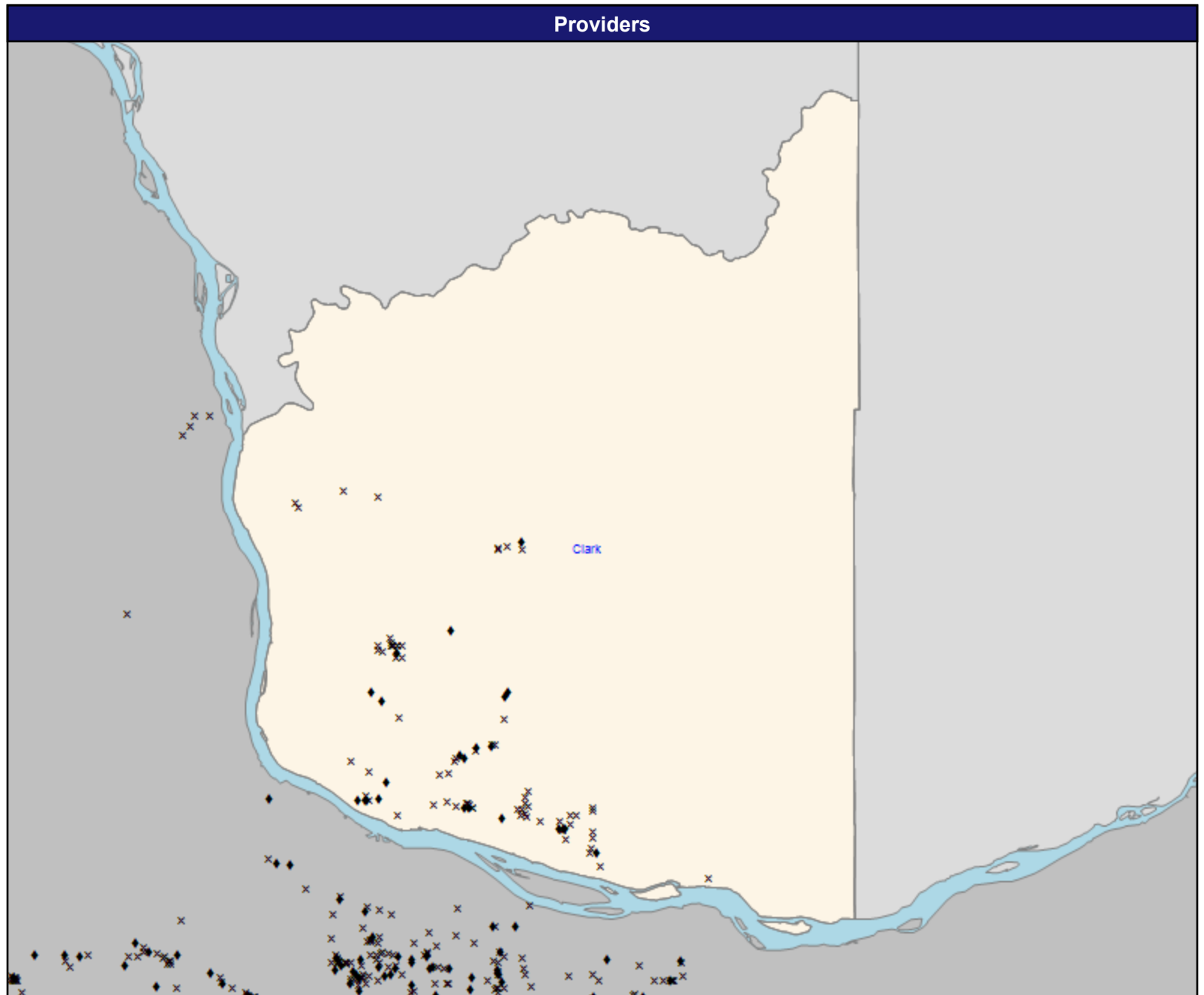
Provider Map

April 9, 2026

Primary Care

6,890 providers at 1,472 locations

- ◆ Single providers (379)
- ✕ Multiple providers (1,093)



Access Overview

April 9, 2026

Access Analysis

Specialties

Member / Provider Groups

Urban (Regence BlueCross BlueShield of Oregon Individual Connect Network) Primary Care

Access Map

Member locations

- With access
- Without access

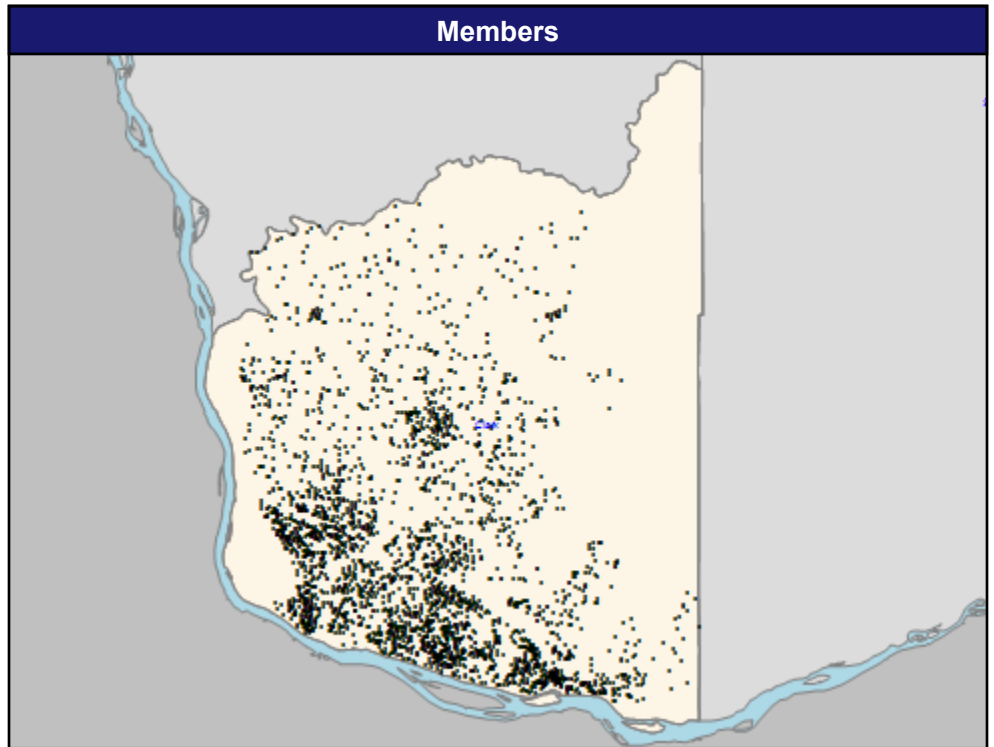
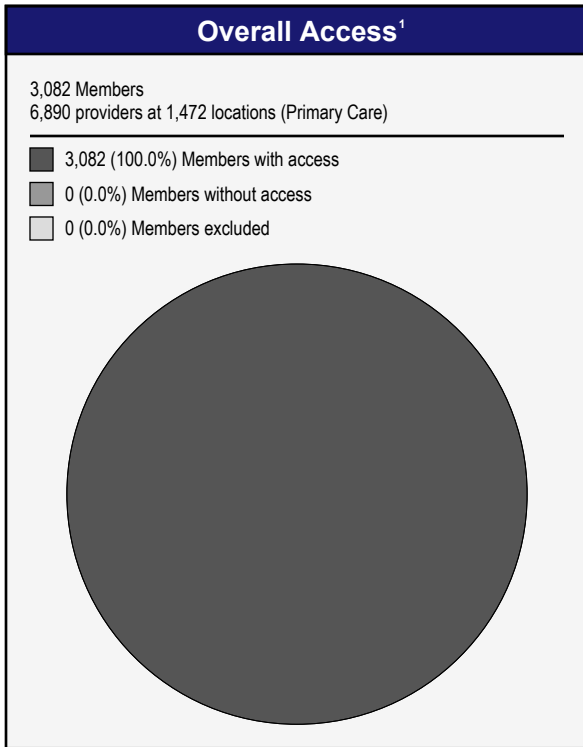
Comparison Graph

Percent of members with access to a choice of providers over miles

- 1st closest

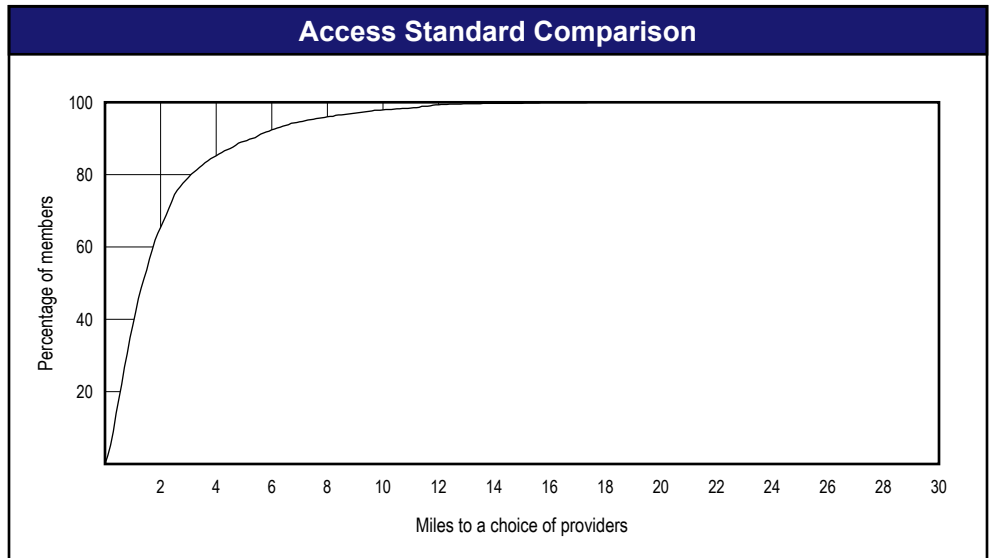
¹ The Access Standard is defined as (Urban (Regence BlueCross BlueShield of Oregon Individual Connect Network)) members accessing:

1 (Primary Care) provider in 30 miles



Distances

	Average
Distance to 1st closest provider	2.2 miles



Access Summary By County

April 9, 2026

Access Analysis
Specialties

Member Group
Urban (Regence BlueCross BlueShield of Oregon Individual Connect Network)

Provider Group
Primary Care

Areas With Access

Top 17 Counties in the market, sorted by the number of members with access

Areas Without Access

Bottom 17 Counties in the market, sorted by the number of members without access

¹ Provider counts represent:

#: Provider access points

Members With Access				
Member Group	3,082 members 3,082 (100.0%) members with access 0 (0.0%) members without access		Provider Group	6,890 unique providers at 1,472 unique locations (12,664 total access points)

Key Geographic Areas

	County	Member		Provider		With Access		Counts ¹
		Group	#	Group	Standard	#	%	#
With Access	Clark, WA	Urban	3,082	Primary Care	1 in 30 miles	3,082	100.0	1,045
	Without Access	No data that meets the criteria						