



***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 15, 2025

Ethan Baldwin

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 Consumer-Friendly Document to Accompany Rate Filings Per HB 2564 (2025)**

Dear Mr. Baldwin:

Thank you for the opportunity to provide comments on the Division of Financial Regulation's (DFR) proposed consumer-friendly document that will accompany every rate filing on or after January 1, 2026, as required by HB 2564 (2025).

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 August 6, 2025, you requested feedback on seven proposed elements for the consumer-friendly document. The seven elements are:

1. Company name, website, and customer service contact details
2. Service area; preferably a visual
3. A breakdown of the rate request – e.g. \$%x for trend, \$%x for legislative, \$%x for uncertainty
4. A breakdown of retained premium (how much is going to be kept by the company), and MLR for the last 3 years
5. How to access information in other languages
6. Executive Compensation
7. Changes to Networks

We offer the following comments on three specific elements:

**How to Access the Information in Other Languages**



We recommend this requirement be removed, because we believe this element exceeds the requirements of HB 2564(2025). It will create an undue burden on carriers if it requires translation of certain documents in other languages. Our key concerns is the scope of “information” requiring translation remains unclear. Is it the benefit booklets, rate filing, etc.? If the “information” is in reference to the rate filing, we request the DFR provide a translated template where carriers can insert company-specific information.

### **Executive Compensation**

While we understand the DFR receives frequent consumer inquiries about executive compensation, we respectfully request its removal for the following reasons:

1. It’s immaterial to rate setting. At the last RAC meeting, the DFR acknowledged it plays no role in rate determination.
2. It provides an incomplete picture because aggregated compensation data fails to provide meaningful context about overall administrative costs.
3. Safety concerns. Publishing this information creates security risks for executives and the certifying actuaries whose names appear in public rate filings.
4. Provides limited consumer value as it does not help consumers understand rate drivers.

If the DFR chooses to retain this element, we strongly recommend expressing it as a percentage of total premium, which would be clearer and more understandable to consumers.

### **Changes to Networks**

We do not object to inclusion of it this element based on the DFR’s clarification that “changes to network” refers specifically to modifications that impact rates or necessitate modification/discontinuation filings.

### **Conclusion**

We appreciate the DFR’s collaborative approach through the RAC process and look forward to your decisions on these matters. Cambia remains committed to supporting transparency and meaningful consumer involvement in the rate review process while ensuring that data elements in the consumer-friendly document provide genuine value to consumers.

Thank you for your consideration of our comments.

Sincerely,

A handwritten signature in blue ink that reads "A. Awuakye". The signature is fluid and cursive, with the first name "A." and the last name "Awuakye" clearly visible.

Antoinette Awuakye  
Sr. Public and Regulatory Affairs Specialist