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October 3, 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 #3 on Consumer-Friendly Document to Accompany Rate Filings Per HB 2564 (2025)

Dear Mr. Baldwin:

Thank you for the opportunity to provide these follow-up comments on the revised working draft dated September 16 of the Division of Financial Regulation's (DFR) 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.

Thank you for removing the Executive Compensation data element after hearing our and other insurers concern about adding it in the consumer-friendly document. However, since the DFR indicated it may still include this information later due to consumer requests, we respectfully request to participate in any future discussions. We continue to oppose including executive compensation data, as it is not material to rate-setting decisions.

Our additional comments focus on the: "Requested Percentage Rate Change", "Plans Impacted", "Service Area (visual)", "A breakdown of the rate request" data elements.

<u>Requested Percentage Rate Change*</u>
We recommend insurers provide the minimum and maximum range along with the average rate increase. We believe this approach is more consumer-friendly, provides better predictability, and offers a clearer understanding of the typical impact on members.

Plans Impacted

This data element requires additional clarification. In a rate filing, every plan is impacted. Therefore, a list of all plans would not be useful. We recommend that insurers include the total number of plans that will be available and a list of all plans (by plan names) that will be terminated for the upcoming plan year. Consumers being informed of plan terminations is the most crucial since it directly impacts their coverage decisions.

Service Area (visual)

We recommend that this section reflect where an insurer sells insurance products rather than the broader service area, as insurers may sell in specific counties while providing services across a wider geographic area.

A breakdown of the rate request

The current format limits rate justification to three predetermined rate drivers: trend, legislative changes, and uncertainty. Based on several years of rate filing data, medical and pharmacy trends have been consistent drivers while uncertainty and legislative changes rarely prove to be significant. As such, we recommend allowing insurers flexibility to identify and explain their actual significant rate drivers. This approach would provide (1) a more accurate representation of rate change factors; (2) better alignment with each insurer's unique circumstances; and (3) valuable insights for DFR actuarial review.

Conclusion

We appreciate 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 engagement in rate review while ensuring the consumer-friendly document provide genuine value to Oregon consumers.

Thank you for your consideration of our comments.

Sincerely,

A. Awuakye

Antoinette Awuakye
Sr. Public and Regulatory Affairs Specialist