

**From:** [Suzie Moll](#)  
**To:** [HOLMAN Jeannette \\* DCBS](#)  
**Subject:** PACE Act/Small Group Expansion  
**Date:** Wednesday, October 07, 2015 2:29:43 PM  
**Attachments:** [image001.png](#)

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Good Afternoon Jeannette,

I am an independent agent here in Oregon and have been active in the insurance business since 1985, both on the carrier side for 19 years and on the agent side for the past 11. As you can imagine, I have been through a lot of changes and legislation of our industry.

I am told that you are the person to express my opinion to regarding the recent push to expand the small group employer health market to 100 employees. I appreciate the forum and hope that you take my thoughts into consideration when making a decision about whether to continue on the path to expansion.

1. Groups in this market size are being required to offer insurance as of 1.1.2016. The need for flexibility and plan design is and has been very important to this market segment because there is stiff competition to earn their business. If you take the right away for us to negotiate on behalf of these groups you are taking a way a huge opportunity for us to service this segment as well as to grow this segment. Many of them (to comply with the Pay or Play mandate) will resort to self insuring which may or may not be in the best interest of the clients. And do we want to scare current and potential members out of the healthcare system? And it most likely will be the younger ones who will choose this avenue.....and those are the people we want to attract!
2. This also will create a lot of confusion around the fact that they are small group when it comes to rating, but large group as far as Pay or Play. Consistency is key here.
3. I experienced the change over from the 26-50 market to small group and the younger aged groups got hit with harsh rate increases in that process. Because the methodology is much the same as that, this legislation will affect the younger aged groups who we WANT and NEED in the pool.

Oregon did pass HB2466 to allow us to choose our own path if the federal government delayed the expansion. They have and we should choose to do that too.

Thanks again for your time and consideration.

My Best,

**Suzie Moll | Premier NW Insurance**

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