

From: [Ruppert Reinstadler](#)
To: [HOLMAN Jeannette * DCBS](#)
Cc: [MORTER Michael H * DCBS](#)
Subject: Oregon Small Group Expansion
Date: Wednesday, October 07, 2015 9:21:37 AM

Good morning Jeannette,

Having been in the health insurance field in Oregon since 1976, I wanted to let you know my thoughts on small group expansion in Oregon to include the 51 – 100 life groups. I have been very active with the Oregon Association of Health Underwriters for all these years because they truly care about our agent community and the clients that we represent. I have a great concerns about the idea of requiring these mid-sized groups into the small group pool – especially since the federal government passed the PACE legislation repealing the federal requirement and leaving it up to the states to decide. The last time we tried this consolidation it was merging the 26 – 50 life groups into the same pool with the 2 – 25 life groups and it was a disaster for most of our clients in that upper size range. They received higher than average increases in their group health premiums mostly because of the compression of the rate bands in the rating formulas.

This mid-sized market for groups with 51 – 100 lives is pretty stable right now. The small group rating requirements, lack of flexibility in rating and plan design will have a huge negative impact on these employers. They are struggling now with profit margins and big spikes in their insurance premiums will not help. They are already being plagued with onerous reporting and tracking requirements from the federal government. Let's give them a break where we can. I strongly recommend that we not force these 51 – 100 life groups into the small group pools. We were given the flexibility to do what's right for our employers in the state. Let's take advantage of it.

Sincerely,

Ruppert Reinstadler

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