



October 9, 2015

Department of Consumer and Business Services

Insurance Division

350 Winter St NE, Room 200

Salem, OR 97309

Re: Delay of Small Group Expansion

ATRIO Health Plans supports the delay of the small group expansion and encourages the Insurance Division to revise the definition of a small employer to those with 1-50 employees consistent with the PACE Act.

Small group expansion will eliminate many of the plan choices available to employers (and their employees) with 51-100 employees. The change in rating methodology will result in significant disruption in rates. As rates to employers increase, more mid-sized groups will reduce employee benefits, drop coverage, or self-insure, resulting in additional rate increases for the entire small group market, including those employers with less than 50 employees.

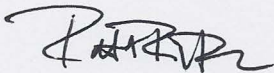
*Roseburg Office – 2270 NW Aviation Drive, Suite 3, Roseburg, OR 97470 - Phone 541.672.8620*

*Salem Office – 3025 Ryan Drive SE, Salem, OR 97301 - Phone 503.967.7418*

In the majority of Oregon counties outside the Portland-metro area, there are very few groups above 100. Groups sized 51-100 make up some of the largest employers in these counties. Employer provided health benefits play a key role in retaining and attracting employees to the rural counties that are still struggling to recover from the recession. The loss of benefit design flexibility and rate increases will cause many of these employers to reduce benefit or drop coverage which significantly affects their ability to retain and attract employees.

We thank you for reconsidering this issue and urge the Insurance Division to consider our comments in support of delaying the small group expansion.

Sincerely,



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Ruth A. Rogers Bauman, CEO

ATRIO Health Plans