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Subject: Oregon Small group expansion
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I would like to comment on the OID's proposed small group expansion. Our agency serves over 200 small businesses in Oregon, without exception the expansion is being seen as a negative for the following reasons.

- Higher rates. Currently carriers are offering dual renewals (1) small and (1) large group option for 2016. Almost without exception small group "metal" quotes are 5% - 30% higher than large group quotes.
- Lack of plan flexibility – we see plan flexibility as being EXTREMELY important to our clients.
- Commoditizing health insurance rather than distinctive value based options that respond to what is important to employers (and their employees). Small group metal plans lack meaningful differentiation.
- Disruption to their business – financially and structurally (having to make hard choices to continue to afford insurance). I don't see employers canceling insurance, rather they value employees and want to continue providing high quality, reliable coverage. This expansion would make that more and more difficult. Case-in-point? Transitional relief, employers are doing all they can to maintain the current climate and the OID should respond to that call.

We would ask the OID to maintain the small group definition as 2 – 50.

Thank you,

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