

**Health Reform Rulemaking Advisory Committee**  
 Summary of public comment received as of **August 28, 2015**.

The Health Reform Rulemaking Advisory Committee meetings are open to the public. Limited time is available at each meeting to present comments in person. All individuals who wish to submit public comment are strongly encouraged to do so in writing via email to Karen.j.winkel@oregon.gov even if they provide comments verbally as well.

Individual	Organization	Rec'd	Public Comment/Testimony
Kathy Gadinas	Columbia Benefit Solutions	8/20/2015	<p>Ms. Gadinas comments relate to the group profile form and the need for simplicity and counting employees for the purpose of issuing coverage. She requested that the state create the form in a manner that cannot be altered in any way by the carrier. She also suggested that when developing the employee counting factors, that seasonal employees should not be included. She emphasized that counting employees inside and outside of the Marketplace must be done in the same way and if not, it could result in different answers of whether the employer was a large or small employer.</p>
Gary Holliday	PacifiSource	8/28/2015	<p>Mr. Holliday's comments are related to the proposed rating methodology for employer groups with 51 to 100 employees for the 2017 renewals. He emphasized that a change in rating would be problematic and disruptive for the following reasons:</p> <ul style="list-style-type: none"> <li>• Renewal Notices/quotes have already been sent to some groups of this size.</li> <li>• The additional time required for rulemaking around the issue.</li> <li>• The increase in administrative costs for carriers to incorporate any changes.</li> <li>• Section 2 of HB 2466 (2015 Legislature) and the fact that plans will discontinue on October 1, 2017.</li> </ul> <p>PacifiSource does not support changes to the rating methodology for the Transitional Health Benefit Plans.</p>