



June 27, 2018

The Honorable Stephen Huffman, Chair
House Insurance Committee
Ohio House of Representatives
77 South High Street, 12th Floor
Columbus, Ohio 43215

Dear Chairman Huffman,

On behalf of the Ohio Association of Health Plans (OAHP), thank you for the opportunity to offer comments intended to supplement interested party testimony OAHP previously submitted on House Bill 546, legislation that would require health plans to provide coverage for telemedicine services, on the same basis and to the same extent as in-person services.

The Ohio Association of Health Plans (OAHP) is the state's leading trade association representing the health insurance industry. OAHP's member plans provide health benefits to more than 9 million Ohioans through employer-sponsored coverage, the individual insurance market, and public programs such as Medicare, Medicaid and the Federal Insurance Marketplace. Our members offer a broad range of health insurance products to Ohioans in the commercial marketplace and are committed partners in public programs.

Every day, Ohioans employers, health care consumers and state payers are challenged to find access to affordable health care. It is through those lenses, OAHP offers the following additional comments to HB 546.

- Today, Ohio's health plans – both commercial and Medicaid - are all offering coverage of telehealth services as a lower cost alternative. In fact, in the commercial market, many employers are demanding that health insurance products include coverage for telehealth services because of the impact on the total cost of care. Additionally, the Medicaid managed care plans cover telehealth services to the extent permitted under current Ohio regulations.
- By statutorily mandating telehealth, Ohio policymakers risk stifling the innovation that is occurring in this area.
- Telehealth should be used as a tool to drive down costs. Telehealth should NOT be used to increase health care costs for consumers, employers and the state as the payer for Medicaid and the State Employees Health Plan. As a result, Ohio's health care consumers

should not have to pay for “bricks and mortar” infrastructure, facility fees and other types of fees hospitals and doctors charge for in person services.

- It is important to understand that not all in-person services are conducive to telehealth.

On May 22, 2018, OAHP met with Representative Tom Patton, the bill sponsor, and shared how Ohio’s health plans are driving telehealth efforts and cautioned him about the unintended consequences of statutorily mandating technology.

During this meeting Representative Patton agreed with our concerns and told us that is not the intent of the bill. Further, Representative Patton offered assistance in "fixing" these issues, should they arise in the future. We applaud Representative Patton in his leadership in the telemedicine space, and his willingness to fix potential issues, even after the bill has passed and become law.

Considering the Ohio General Assembly’ on-going regulatory reform work and efforts to maximize technology, OAHP respectfully requests thoughtful consideration of this bill and the impact on Ohio’s health care consumers.

OAHP and its member plans stand ready to work with state policymakers to achieve the shared goal of affordable and quality healthcare for all Ohioans.

Thank you for the opportunity to provide further comments on HB 546.

Sincerely,

A handwritten signature in black ink that reads "Miranda C. Motter". The signature is written in a cursive, flowing style.

Miranda C. Motter
President and CEO
Ohio Association of Health Plans