

HB 474 Opponent Written Testimony

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Barberton, Ohio
Ohio House Insurance Committee
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Chairman Lampton, Vice Chairman Barhorst, Ranking Member Jarrells, and Members of the House Insurance Committee,

Thank you for the opportunity to submit written testimony today as an opponent of HB 474.

My name is J. Craig Brown II, and I am the President and CEO of Christian Healthcare Ministries (CHM), headquartered in Barberton, Ohio. CHM is a nonprofit 501(c)(3) organization and the nation's first and longest-serving health cost-sharing ministry. Since our founding in 1981, we have shared 100% of eligible medical bills and have satisfied over \$11 billion in healthcare costs for our members, providing a faith-based framework for believers to assist one another in times of medical need.

HB 474 proposes three key policy changes:

1. Define Healthcare Sharing Ministries (HCSMs) as religious charities regulated under Ohio's charitable organization code rather than the insurance code.
2. Exempt public university students who are HCSM members from their school's insurance coverage requirements.
3. Allow Ohioans participating in HCSMs to deduct their monthly contributions from their taxes, similar to insurance premium deductions.

We fully support the second and third proposals, which expand choice for Ohioans, allowing them to select healthcare sharing ministries in lieu of traditional health insurance and receive tax-deductible benefits. However, we strongly oppose the first proposal for one fundamental reason:

The government—at any level—has no constitutional authority to regulate ministries like CHM.

HB 474 introduces language that seeks to define and regulate healthcare sharing ministries. While proponents claim this is a protective measure, we view it as unnecessary and, more importantly, as an encroachment on our constitutionally protected right to the free exercise of religion. Ministries like CHM operate as expressions of faith, not as businesses, and should be afforded the same protections as any church or religious institution.

Imagine if the government required local churches to submit membership rosters or financial budgets for review. Such an intrusion would rightly cause outrage and violate First Amendment protections. Ministries like CHM are no different in this regard; the free exercise of religion extends beyond the walls of a church building and includes faith-based initiatives like ours.

This principle has been affirmed in Ohio through legal precedents, including the *Humphrey v. Ohio Department of Rehabilitation and Correction* case. In that case, the Ohio Supreme Court not only embraced federal First Amendment protections but also reinforced that the Ohio Constitution provides even stronger safeguards for the free exercise of religion. The court recognized that individuals and organizations are entitled to practice their faith without interference or regulation by the government.

HB 474's language would undermine these protections. Any attempt to define or regulate ministries, even under the guise of "light" or "protective" regulation, risks granting the government inappropriate authority over our operations. For example, the bill includes provisions allowing the Ohio Attorney General to determine whether an organization qualifies as a healthcare ministry. This is deeply troubling. The government should not—and cannot—have the power to decide what constitutes the practice of religion.

Existing Ohio law already provides a robust framework that respects these boundaries. CHM has operated in Ohio for over 40 years without interference from the Department of Insurance or other state agencies attempting to regulate us as insurance. Adding new definitions or regulatory language is unnecessary and counterproductive.

Let me be clear: Ministries like CHM do not need government-defined "safe harbors" to operate. Our ability to serve is rooted in the First Amendment and the protections it affords to all Americans to freely exercise their faith. HB 474's first provision undermines this fundamental truth by suggesting that the government has a role in defining or overseeing our operations. This is a solution looking for a problem that does not exist.

We urge the committee to reject the regulatory language in HB 474. Instead, we encourage you to focus on the provisions that expand choice and flexibility for Ohioans, such as tax deductibility and student exemptions, while preserving the constitutional freedoms that allow ministries like CHM to thrive.

Thank you for the opportunity to share Christian Healthcare Ministries' concerns and opposition to HB 474. We remain committed to serving our members and upholding the principles of faith and freedom that define our work.

Sincerely,

J. Craig Brown II
President & CEO
Christian Healthcare Ministries