

**Ohio Senate Financial Services, Insurance, and Technology Committee**  
**Senate Bill 100**  
**April 1, 2025**  
**Opponent Testimony**

Chairman Wilson, Vice-Chairman Lang, and Ranking Member Craig, on behalf of the National Association of Benefits and Insurance Professionals Ohio Chapter (NABIP – Ohio) – a member organization representing licensed agents and brokers who are engaged in the sale and service of health insurance and other ancillary products and serving employers and consumers in the state of Ohio – to bring your attention to consumer protection concerns related to Senate Bill 100.

NABIP-Ohio recognizes the need for insurance accessibility and that the intent behind Senate Bill 100 is to expand accessibility to consumers by allowing non-profit agricultural membership organizations to sell non-insured reduced benefit plans to their members. However, in states where similar legislation has been implemented, consumers are routinely, and unintentionally, misled into purchasing policies that do not meet their healthcare needs. Policies issued through these non-profit agricultural membership organizations are not health insurance and our organization is concerned that consumers will not understand the coverage they are enrolling in and may not provide adequate coverage for critical services.

Senate Bill 100 would also give unregulated or unlicensed sales representatives the opportunity to make recommendations to their clients, even though they may not meet the educational requirements licensed health insurance agents and brokers are subject to. While we understand these organizations have only the best of intentions, the lack of oversight of these plans ultimately could lead to confusion and higher costs for consumers. NABIP-Ohio members are licensed through the Ohio Department of Insurance, and the regulations our members follow are designed to protect Ohioans in the health insurance market. Exempting “insurance-like” actors from regulatory oversight could ultimately disadvantage Ohio consumers. We believe that the committee should consider adding language to this bill requiring that all disclosures, otherwise required by the Ohio Department of Insurance, be displayed prominently on all contract and renewal documents, be read and explained to consumers at the point of sale, be included on the organization’s internet website, and in all advertising and marketing materials. We believe this could address our consumer protection concerns with this legislation.

While these bills have the goal of increasing options for consumers, it is imperative that consumer protections are applied to all policies available in our state and that all agents are subject to the same standards. On behalf of NABIP-Ohio, I would like to thank you for your attention to this matter. We appreciate the committee’s review of our testimony and are willing to continue dialogue around this, or any other insurance matter.

Barb Gerken  
Legislative Chair – NABIP-Ohio