

The logo for the Ohio Association of Health Plans features a stylized lowercase 'i' on the left. The dot of the 'i' is a light blue circle, and the stem is a dark blue shape that curves to the left and then down. To the right of the 'i' is the text 'Ohio Association of Health Plans' in a bold, red, sans-serif font.

Ohio Association of Health Plans

December 7, 2021

Chairman Bob Peterson
Senate General Government Budget Committee
1 Capital Square
Columbus, Ohio 43215

Dear Chairman Peterson,

On behalf of the Ohio Association of Health Plans (OAHP), thank you for the opportunity to offer written opponent testimony on House Bill 218, which would put Ohioans at risk of increasing the cost of health care for families, individuals, and businesses.

OAHP is the state's leading trade association representing the health insurance industry. Our 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.

Through the COVID-19 pandemic we have seen how quickly infectious disease can spread when left unchecked. From an individual's health to the health of the economy, the pandemic affected almost every aspect of our lives. However, with multiple vaccines now widely available, further serious infection and spread can be greatly reduced. Unfortunately, HB 218 would negatively impact an employer's ability to require a COVID-19 vaccine. OAHP member plans believe that an employer's right to make decisions in the best interests of its employees must be protected.

Vaccines are an important tool in preventing or diminishing the severity of potential illness within communities, as well as keeping health care costs down. The COVID-19 vaccines are no different. For instance:

- COVID-19 was the number one cause of death in the United States in September 2021¹.
- COVID-19 Hospitalizations among unvaccinated adults totaled \$5.7 billion from June 2021 – August 2021².

As a result of these realized costs associated with refusing the COVID-19 vaccines, some companies are responding in a monetary way. For example, Delta Airlines announced it is implementing a \$200 a month surcharge for each unvaccinated employee to cover the anticipated \$50,000³ in COVID-19 related hospital and health care costs.

HB 218 has the significant potential to raise health insurance costs for Ohio's employers. The bill allows an employee to seek an exemption to an employer's COVID-19 vaccine policy but does not make that employee responsible for any costs or fees associated with measures required by the employer to prevent the spread of COVID-19, including testing for

¹ <https://www.healthsystemtracker.org/brief/covid19-and-other-leading-causes-of-death-in-the-us/>

² [Peterson-KFF Health System Tracker](#)

³ [Amid COVID-19 surge, companies push to get employees vaccinated \(today.com\)](#)

active infection. Accordingly, in order to keep its business running with a healthy workforce in light of those employees who have refused vaccination, the employer and its insurer will incur all of the costs for any regular testing to ensure that there is no active infection in the unvaccinated employees.

A [report from the Kaiser Family Foundation](#)⁴ this year found that hospital charges for coronavirus tests ranged from \$20 to \$1,419 — not including physician or facility fees. About half the test charges were below \$200, the report noted, but 1 in 5 were more than \$300. Accordingly, if an employer has several employees who seek an exemption from a COVID-19 vaccine policy under the terms of HB 218, that employer and its insurer face significant increased costs for regular testing of the exempt employees simply to keep its other employees healthy and ensure that the business remains operational. Ultimately, because of this provision in HB 218, these increased costs borne wholly by the employer and its insurer will lead to higher insurance premiums.

Thank you for the opportunity to comment on HB 218 on behalf of the more than 9 million Ohioans to whom member plans provide health care coverage. We stand ready to work with policymakers to develop meaningful solutions that address the health of every Ohioan.

Sincerely,

A handwritten signature in black ink that reads "K O'Reilly". The letters are stylized and cursive.

Kelly O'Reilly
President and CEO

⁴ <https://www.healthsystemtracker.org/brief/covid-19-test-prices-and-payment-policy/>