



October 25, 2017

The Honorable Stephen Huffman, Chair  
House Health 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 comment on House Bill 273.

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.

House Bill 273, as currently drafted, would prohibit physicians from being required to secure maintenance of certification to obtain licensure, reimbursement, employment, or admitting privileges. Maintenance of certification (MOC) refers to certain continuing education that enable a physician to maintain an active board certification status. These standards are frequently used to distinguish providers relative to quality of care and continuous improvement.

As this Committee considers legislation that would relieve Ohio physicians of these requirements, OAHP would like to offer the following for consideration:

- Health plans have processes in place that allow them to waive MOC requirements, when necessary i.e. where there might be a provider shortage. A one-size-fits all statutory approach, such as the one contemplated in HB 273, eliminates this flexibility (and the balance between quality and access that flexibility represents) and should be carefully considered.

- It is unclear how this bill might impact current efforts to improve patient centered care (such as patient centered medical homes, the State Innovative Model and Comprehensive Primary Care) and quality assurance programs (such as National Committee for Quality Assurance (NCQA) accreditation and recognition programs).
- Health Plans recognize that the current MOC requirements are not perfect and could be improved upon; however, a statutory approach that eliminates all MOC requirements in every setting could lead to numerous unintended consequences.

To that end, OAHP respectfully requests a stakeholder process to refine the bill in a way that balances administrative relief with quality care. OAHP stands ready to participate in a process that brings together physicians, hospitals, private and public payers and the appropriate certifying boards to further discuss a way to approach the underlying goal of this legislation.

Thank you for the opportunity to comment on HB 273. As always, The Ohio Association of Health Plans and its member plans stand ready to work with state policymakers to achieve the shared goal of quality healthcare for all Ohioans.

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