

Chairman Warrey and Members of the Committee –

Good Morning – my name is Dylan Wheeler, Head of Government Affairs for Sanford Health Plan. This morning, speaking in opposition to SB 2348, which de-regulates health care sharing ministries from statutory and regulatory oversight in North Dakota. To be clear on the front end – my comments this morning are in no way to be construed against any religion; rather, speaking primarily through the lens of a health insurance carrier that abides by and adheres to the statutory and regulatory structure here in North Dakota.

What is insurance? This may seem like a basic question, but it is one that should be addressed when discussing this bill. If a product is held out as, acts like, or otherwise functions like insurance – such products should be under the oversight of the North Dakota Insurance Department. Generally, insurance may be defined as “a practice or arrangement by which a company or government agency provides a guarantee of compensation for specified loss, damage, illness, or death in return for payment of a premium.”

So that naturally leads to the subsequent question as to whether a health care sharing ministry meets the definition of insurance – the answer is yes. Health Care Sharing Ministries charge members of the plan a monthly premium in exchange for covering specified services under the plan. Thus, health care sharing ministries are insurance and should not be exempted from North Dakota oversight.

Finally, from a health system and provider point of view, health care sharing ministries often cause confusion, abrasion, and frustration with patients and health systems. Health systems may not contract with health care sharing ministries because reimbursement rates are incredibly low and they put patients in a position with large financial bills due to confusion of what is or is not covered.<sup>1</sup>

In conclusion – health care sharing ministries are insurance products and should be held to the same standard as health insurance carriers in North Dakota. They insure against future losses in exchange for payment of a premium.

We request a Do Not Pass recommendation on the bill and I will stand for any questions.

Dylan C. Wheeler  
Head of Government Affairs  
Sanford Health Plan

---

<sup>1</sup> See <https://www.nbcnews.com/health/health-care/health-care-cost-sharing-ministries-maternity-childbirth-rcna170230>