



February 15, 2021

The Honorable Delores G. Kelley
Chair, Senate Finance Committee
3 East
Miller Senate Office Building
Annapolis, MD 21401

Dear Chair Kelley:

Thank you for accepting this letter to serve as testimony in support of SB 543 by Senator Eckhardt—important legislation to guarantee Marylanders continue to have every option available to them in order to access health care during the pandemic and exercise their religious freedoms consistent with the long history of religious tolerance in Maryland that stretches back to the mid-17th Century, predating the existence of the United States.

OneShare Health is a Christian Health Care Sharing Ministry (HCSM) based in Texas and is a member of the Alliance of Health Care Sharing Ministries (AHCSM). We are a 501(c)(3) charitable organization and have been determined to meet the federal definition of an HCSM pursuant to 26 USC 5000A(d)(2)(b)(ii) and for the purposes of 45 CFR 155 Subpart G according to the Centers for Medicare & Medicaid Services (CMS).

Faith-based charities like OneShare have been operating in Maryland for forty years. We facilitate medical cost sharing among our ministry members by coordinating member contributions and assigning those contributions to satisfy the medical bills of other members of the group. Our sharing model is distinct from insurance in that there is no assumption of risk, no promise to pay, and no guarantee of coverage—consistent with the safe harbor laws for HCSMs that exist in Maryland and 29 other states.

Unfortunately, the Maryland Insurance Administration alleges that HCSMs allowed under the Affordable Care Act are unauthorized health insurers despite the existence of Maryland's safe harbor statute.

Thankfully, SB543 would establish a direct link between Maryland law and the actual text of the Affordable Care Act relative to HCSMs, thus clarifying that the health care option we provide is not insurance and therefore eliminate any confusion for MIA regulators that would enable them to deny Marylanders a health care option during a pandemic and the ability to exercise their faith.

Currently, OneShare does not operate in Maryland due to the current regulatory scheme. Passage of SB 543 would allow our ministry to reach out to Marylanders that wish to participate in our non-profit health care sharing ministry.

Faith is the foundation of OneShare's ministry, and all members must attest to a written Statement of Beliefs. The core values of our ministry can be summed up by the following biblical commands: Love God and neighbors (e.g. Matthew 22:36-40; Mark 12:28-34; Luke 10:25-28); Carry the burden of others (Galatians 6:2); Caring for others as one would oneself (Luke 10:25-37).

The definition of HCSMs found in the Affordable Care Act was the result of bipartisan work in 2009 by the then Chairman and Ranking Member of the Senate Finance Committee, Sens. Baucus and Grassley,

respectively. However, health care sharing ministries in America date back to at least a century among Mennonite and Amish communities—including those in Maryland.

In a time of pandemic when every health care option for Marylanders should be on the table, we believe that all Americans should look for ties that bind rather than divide. SB543 is such a tie. Sen. Eckardt's proposed legislation would allow Marylanders of faith to continue to enjoy the state's long history of religious tolerance free from the intervention of state regulators and, importantly, harken back to a time—just less than a dozen years ago—when Democrats and Republicans worked together in Washington to forge positive policy in the midst of contentious debate.

OneShare Health is proud to stand with our fellow Alliance members in support of SB543 as it stands to benefit the citizens of Maryland.

Sincerely,

A handwritten signature in black ink that reads "Buddy Combs". The signature is written in a cursive style with a large, prominent "B" and "C".

Buddy Combs
Chief Legal Officer, General Counsel, & Interim CEO