



September 9, 2025

Senator Nick Collins, Chair
Joint Committee on State Administration
and Regulatory Oversight
State House, Room 511-A
Boston, MA 02133

Representative Antonio F. D. Cabral, Chair
Joint Committee on State Administration
and Regulatory Oversight
State House, Room 466
Boston, MA 02133

RE: 9/9 Joint Committee on State Administration and Regulatory Oversight Legislative Hearing
MAHP Support: House No. 3362

Dear Chairs Collins and Cabral,

On behalf of the Massachusetts Association of Health Plans and our 13 member health plans and one behavioral health organization, providing health insurance coverage to nearly 3 million Massachusetts residents, we appreciate the opportunity to express support for House No. 3362, which would establish important tools to increase transparency on the increasing costs of health care.

H.3362 would require a state agency to file a premium impact statement with the Secretary of State's office prior to the adoption of any health insurance related regulation. Specifically, the agency would be required to consider the impact the proposed action will have on health insurance premium rates in Massachusetts, providing stakeholders with greater transparency.

MAHP member plans are committed to and have undertaken a variety of efforts toward controlling both medical expenses and administrative costs. According to the Center for Health Information and Analysis's (CHIA) 2025 Annual Report on the Performance of the Massachusetts Health Care System, total health care expenditures (THCE) in Massachusetts totaled \$78.1 billion in 2023, and THCE per capita increased 8.6% from 2022 to 2023, far exceeding the health care cost growth benchmark of 3.6% set by the Health Policy Commission (HPC)¹. Health plans are heavily regulated by a variety of state agencies and authorities, such as the Division of Insurance, CHIA, the HPC, and the Massachusetts Health Connector. In addition to regulating health plans, some entities have the authority to impose assessments or increase the number of mandated benefits. These assessments and mandated benefits add to the cost of coverage for Massachusetts consumers and employers.

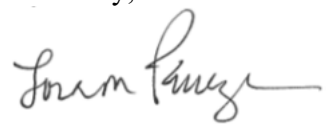
Controlling health care costs is the critical issue facing the health care system and H3362 would provide the state with important tools to better understand the impact of proposed regulatory requirements and mandated benefits on the cost of coverage for employers and consumers.

For these reasons, we **support House Bill 3362**.

¹ Center for Health Information and Analysis. Annual Report on the Performance of the Massachusetts Health Care System, March 2025. <https://www.chiamass.gov/assets/2025-annual-report/2025-Annual-Report.pdf>

Thank you for the opportunity to share our views in support of this bill. Please do not hesitate to contact me for additional information or to discuss this bill further.

Sincerely,

A handwritten signature in black ink, appearing to read "Lora M. Pellegrini", followed by a horizontal line.

Lora M. Pellegrini, President and CEO
Massachusetts Association of Health Plans