



## Ohio House Insurance Committee

### House Bill 21

November 4, 2025

### Opponent Testimony

Chairman Lampton, Vice-Chairman Craig, and Ranking Member Hall, thank you for the opportunity to provide testimony today. On behalf of the National Association of Benefits and Insurance Professionals – Ohio Chapter (NABIP–Ohio), we appreciate the opportunity to share our consumer protection concerns regarding House Bill 21. NABIP–Ohio represents licensed agents and brokers who serve Ohio employers and consumers in the sale and service of health insurance and related benefit products.

NABIP–Ohio recognizes the importance of expanding access to affordable health coverage. We understand that the intent behind House Bill 21 is to increase accessibility by allowing health care sharing ministries to offer non-insurance, reduced-benefit plans to their members. However, in states where similar legislation has been implemented, consumers have been unintentionally misled into purchasing products that do not meet their healthcare needs. These arrangements are not health insurance, and our concern is that consumers may not fully understand the limitations of the coverage they are enrolling in—potentially leaving them without protection for critical services.

Examples such as the [Thin Blue Line Benefits Association](#) and the [California Health Sharing Ministries settlement](#) illustrate the risks of unregulated health “plans.” In both cases, the organizations were unable to pay claims. Requiring oversight by the Ohio Department of Insurance (ODI) would ensure financial accountability, solvency monitoring, and protection for Ohio consumers.

House Bill 21 would also allow unregulated or unlicensed individuals to make product recommendations, even though they do not meet the same educational and ethical standards required of licensed health insurance professionals. While we recognize that many of these organizations operate with good intentions, the absence of regulatory oversight could lead to consumer confusion and higher costs. NABIP–Ohio members are licensed through the ODI, and those licensing requirements exist precisely to protect Ohioans. It is also important to note that our members cannot sell these types of products under their Errors & Omissions insurance policies, reflecting the inherent risk and lack of accountability associated with such “plans.” Exempting “insurance-like” entities from oversight would ultimately disadvantage Ohio consumers.

At a minimum, we recommend that the committee consider adding disclosure requirements to House Bill 21. Specifically, all disclosures required by the ODI should be:

- Displayed prominently on all contracts and renewal documents,
- Clearly explained to consumers at the point of sale,
- Included on the organization’s website, and
- Featured in all advertising and marketing materials.



While we understand and appreciate the goal of increasing consumer choice, meaningful consumer protections must apply consistently across all coverage options in our state, and all individuals selling or advising on these products should be subject to the same professional standards.

On behalf of NABIP–Ohio, thank you for your time and consideration. We appreciate the committee’s review of our testimony and welcome the opportunity to continue the dialogue on this or any other insurance-related issue.

Barb Gerken  
Legislative Chair – NABIP-Ohio