

Health Care Sharing Plans and Arrangements in Colorado

Colorado House Bill 22-1269 2023 report

October 2024

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Background

The 73rd Colorado General Assembly passed <u>House Bill 22-1269</u> ("HB22-1269") requiring Health Care Sharing Ministries, Plans, or Arrangements ("HCSAs") to report data annually to the Division of Insurance ("Division") and "for the Commissioner [of Insurance] to prepare a written report summarizing the information submitted" about the HCSAs operating in Colorado. HCSAs report data to the Division about annual enrollment and financial data, use of licensed producers, HCSA member guidelines, and marketing materials.¹ These data reporting efforts are intended to increase transparency about HCSAs for Colorado consumers.

Regulation 4-10-01 defines a "Health care sharing plan" or "health care sharing arrangement" or "plan" or "arrangement" or "HCSPA" as, "any organization that offers or markets products to facilitate payment or reimbursement of health-care costs or services for one (1) or more residents of Colorado. This does not include direct primary care agreements as defined in § 6-23-101, C.R.S.; consumer payment plans offered directly between a provider and patient (or patient's responsible party); businesses used to facilitate the plan's operations such as reimbursement handling, cost containment vendors, data processing; and crowdfunded sources that do not require ongoing membership fees, share requirements, or dues for the purposes of payment for and/or reimbursement of health care services." Colorado law requires all HCSAs to report data to the Division annually.

Overview of Data Collection Efforts

To collect data from HCSAs offering plans or arrangements in Colorado in 2023, the Division used the infrastructure implemented for previous years' data collection efforts and released regulation 4-10-01. This included two years of data collection under Emergency Regulation 22-E-20, two public meetings ahead of the adoption of Emergency Regulation 22-E-20, discussions with representatives from different Sharing Plans, two public comment periods to respond to draft forms of regulation 4-10-01, updates to the data reporting template, and a dedicated HCSA data collection webpage to meet the requirements of Colorado statute. The two previous years of data collection efforts and feedback provided by consumer advocates, HCSAs, and members of the public helped refine updates to the regulation and data reporting template. Additionally, the Division offered HCSAs one-on-one office hours to answer questions and help clarify the reporting requirements. One HCSA reached out to the Division with questions ahead of the submission deadline.

By May 31, 2024, seventeen HCSAs submitted data for the 2023 calendar year. Division staff reviewed all submissions for completeness; followed up with each HCSA if materials were missing or data elements did not appear to follow Section 10-16-107.4 CRS and regulation 4-10-01.

¹ For a full list of all information required to be reported to the Division annually by HCSAs see § 10-16-107.4(1), Colorado Revised Statutes ("C.R.S").

² Regulation 4-10-01 establishes the data reporting requirements applicable to all HCSAs offering or that intend to offer plans or arrangements to facilitate payment or reimbursement of health-care costs or services for residents of Colorado.

³ Links to these items can be found in the Appendices below.

Five HCSAs reported a subset of required values for 2023⁴. Given the potential statistical impact these missing data could have on comparing financial data from one year to the next, the Division cautions against comparing the summary financial data provided in this report to previous years' reports. All seventeen HCSAs reported enrollment data for 2023.

Summary of Findings

Seventeen HCSAs submitted data to the Division ahead of the publication of this report. For the purposes of this report, where inconsistencies in the data are present, the Division has presented a subset of data in the summary sections to include only those from HCSAs that reported in accordance with Regulation 4-10-01 and noted this in the footnotes.

HCSAs do not have uniform sharing or business practices and where some data points required by law are not applicable to a specific HCSA and the HCSA has communicated that distinction in their reporting template "N/A" is used in this report to note that distinction. Where data were missing from a submission "-" is used.

Membership

Presented in Table 1 is a summary of enrollment related data for each HCSA in 2023.

Table 1. 2023 Enrollment Data per HCSA

Organization	Number of Colorado members enrolled	Number of members enrolled nationally	Number of Coloradan households participating	Number of Colorado members participating through an employer	Number of Colorado members enrolled through a producer
Altrua Ministries	264	11,564	145	0	0
Christian Care Ministry, dba Medi-Share	17,127	408,793	6,518	216	0
Christian Healthcare Ministries	13,593	476,828	5,824	294	0
Impact Health Sharing	360	14,588	210	N/A	360
Jericho Share	2,587	12,864	1,681	-	2,587
Knew Health	162	2,902	86	2	0
Liberty HealthShare	2,911	60,858	1,362	6	-

⁴Due to ongoing litigation relating to HCSA entities and regarding the reporting requirements, the Division will not comment on individual HCSA submissions for the 2024 reporting cycle.

Organization	Number of Colorado members enrolled	Number of members enrolled nationally	Number of Coloradan households participating	Number of Colorado members participating through an employer	Number of Colorado members enrolled through a producer
Logos Missions, Inc, dba Christian Mutual Medical Assistance	174	17,821	N/A	0	0
OneShare	2,116	28,423	1,098	0	0
Samaritan Ministries International	12,828	349,408	3,510	187	-
Sedera Medical Cost Sharing Community	2,562	35,447	1,171	344	1564
Sedera, Inc.	716	3,807	361	66	706
Share HealthCare	53	618	26	0	0
Solidarity	551	19,429	210	N/A	0
Unite Health Share Ministries ⁵	Redacted	Redacted	Redacted	Redacted	Redacted
Universal Health Fellowship	758	10,079	542	N/A	758
Zion HealthShare	4,700	51,185	2,488	0	0

In 2023, seventeen HCSAs reported a total membership of 62,461 Coloradans and 1,521,668 members nationally. Colorado HCSA membership numbers represent slightly over 4% of national HCSA enrollment of these HCSAs. In comparison, Colorado's 2020 census population is 1.7% of the national population.⁶ Actual enrollment in HCSAs in Colorado is likely different than reported here as other HCSAs could be operating in Colorado but have not reported data to the Division.

Seven of the seventeen HCSAs reported Colorado employer groups participating in sharing arrangements in 2023. Of the seven HCSAs that reported data on employer participation, the range of members participating in a HCSA per employer is 1 to 65 members, with an aggregate total of 1,115 members across all seven HCSAs.

⁵ Unite Health Share Ministries (UHSM) requested that data supplied on tabs 2 and 3 of the reporting template, and therefore what would be displayed on this table, be confidential. Where "Redacted" is displayed the data were submitted to the Division but redacted from the report.

⁶ United States Census Bureau. [Profile United States 2020 census data]. Retrieved from https://data.census.gov/profile?q=0100000US

Financial Information

Twelve HCSAs reported the required financial information to the Division. However, one of the HCSAs requested that their financial information be kept confidential, and they are excluded from the summary analysis presented in this section.

HCSAs are required to report the "Total amount of fees, dues, shares, contributions, or other payments collected from individuals, Colorado employer groups, or others who participated in the [HCSA's] product." The eleven HCSAs collected \$39,474,869 in total fees, dues, shares, contributions, and other payments from members in 2023.

HCSAs are also required to report on the dollar amount of healthcare costs submitted for their members' sharing requests, the dollar amount of those healthcare costs that are determined eligible for sharing based on their specific member guidelines, and the dollar amount paid or shared to cover healthcare expenses the HCSA determines are eligible for sharing. A total of \$96,207,407 in healthcare costs were submitted for sharing by members of the eleven HCSAs. Many of the HCSAs note that the dollar amount of healthcare costs or services submitted for sharing includes duplicate charges, ineligible charges based on the HCSA's sharing guidelines (for example a member may receive a single itemized bill from a provider with both eligible and ineligible charges but the full bill is submitted as part of the sharing request), discounts that the HCSAs negotiated on their members' behalf, and the members' agreed-upon portions of medical bills. Once those amounts ineligible for sharing were deducted, the eleven HCSAs reported that \$58,590,086 of members' total 2023 health care costs were determined eligible for sharing. Of the \$58,590,086 determined by the HCSAs to be eligible for sharing \$34,291,846 in healthcare costs or services were paid by the HCSAs by December 31, 2023.

Actual health care costs of Colorado members were likely different than the HCSAs reported as some bills/share requests do not include costs for benefits excluded from sharing and were not submitted by the member. Nor do the amounts submitted to the Division include the amounts members need to pay before being eligible for sharing. This is sometimes referred to as an "Annual Unshared Amount" and the amount varies within a HCSAs offered products and across HCSAs.

The guidelines of twelve⁷ HCSAs explicitly state that members must use or are obligated to pursue⁸ other payment options available to the member before submitting a share request otherwise the member's healthcare costs are not eligible for sharing. This includes using insurance, Medicare, Medicaid, Veterans Administration, Tricare, private/public grants, crowdfunding, and any liable third party (in the event of an accident) before submitting a share

⁷ Five HCSAs did not submit their member guidelines as required

⁸ An example of "obligation to pursue" other payment options is copied from one HSCA's member guidelines with the name of the HCSA removed from the quote, "it is your [the member's] obligation to pursue payment from any other responsible payer before submitting such medical expenses to [HCSA] for assistance. If a governmental, insurance, or religious program; liable third party; fraternal organization; or any other financial assistance source will pay any portion of the qualifying medical bill, that amount will offset any unshared and/or shared amounts applied to the member's needs up to the total amount of the need. If the Sharing Member refuses to accept such assistance, then that portion of the medical need also becomes ineligible for sharing."

request. From one HCSA's member guidelines, "Failure to disclose coverage with an insurance, third-party administrator, or government assistance plan may result in ineligibility for sharing. This includes, but is not limited to, any form of coverage through a non-member spouse, family member, employer, or government entity." One HCSA requires or suggests that members first request providers and hospitals to reduce or write off eligible health care bills (sometimes referred to as a "self-pay" discount).

Five HCSAs also state or suggest that members must first request charity care and financial support from local governments and consumer support organizations in paying the member's health care bills by including language such as, "Needs do not qualify for sharing to the extent that they are discountable by the health care provider or payable by any other source, whether private, governmental, or institutional." This means that medical costs submitted for sharing by a member (and what is later submitted to the Division through the data reporting template) are likely different from the total health care cost to provide those services.

Marketing Efforts and Use of Producers

Five HCSAs reported that 262 producers enrolled 6,442 members in these five HCSAs. The range of Colorado membership enrolled via producers varies from 1 member enrolled through a producer for one HCSA to 1,151 members enrolled through a producer for another HCSA. HCSAs are not required to report the names, business, or license numbers of individual producers so the count of 262 producers across this subset of HCSAs is not a unique count of producers and likely includes double counting.

Four of the five HCSAs that reported an association with producers also reported on the "total commission, fees, or remuneration paid in [2023] to producers for: marketing, promoting, or enrolling Colorado participants". The fifth HCSA included their producer payment information with one of the other HCSAs that reported on this value. Producers were paid a total of \$100,580 in 2023 by the four HCSAs. The Division noted inconsistencies in how some HCSAs reported on the use of producers to enroll members in HCSAs and on the commissions, fees, or remunerations paid to producers. Some of the HCSAs commented that they cannot know if their subcontractors or third-party administrators follow the definition of a producer or not, so they are unable to report on these required data elements. Additionally, five HCSAs did not submit data on marketing or use of producers. It is possible that more than the five HCSAs noted above work with producers to enroll members and that more than the four HCSAs noted above paid producers for marketing, promoting, and enrolling members.

Six HCSAs paid third parties \$892,039 for "marketing, promoting, or enrolling participants in a plan or arrangement to Colorado participants" and four HCSAs paid third parties \$4,896,482 for "operating, managing, or administering a plan or arrangement offered by the [HCSA]."

Sixteen HCSAs used social media to communicate to members and to market their products. Non-confidential marketing materials submitted by each HCSA, which include examples of social media posts, will be posted in the coming months to the <u>Division's website</u>.

Data Limitations

Information provided by each HCSA includes an attestation that the annual submission is the "best of your good-faith knowledge and belief, is accurate and satisfies the requirements of § 10-16-107.4, C.R.S." and must be signed by an officer of the HCSA. The Division has checked each submission for completeness but is limited in its ability to independently verify all or some parts of each submission. The Division intentionally does not, and will not, collect information on individual HCSA members, employers, or producers.

Five HCSAs reported a subset of required values for 20239.

The Division does not collect demographic information about HCSA members; the types of employers who help cover an HCSA membership for their employees; or the names of producers used to enroll members into HCSAs.

HCSA members can switch HCSAs mid-year and would be double counted in this situation without a way to be deduplicated from the data submitted to the Division and used in this report. Therefore, the values for these data points in this report may not be a unique count.

Questions or Concerns

If you have a question about your health care sharing arrangement or health insurance coverage you can contact the Division's Consumer Services team. The Consumer Services team is available to answer questions or respond via phone and/or our consumer portal. Information about filing a complaint can be found on the <u>Division's website</u>, emailing <u>DORA_Insurance@state.co.us</u>, or calling 303-894-7490 (within the Denver Metro area) or 800-930-3745 (outside the Denver Metro area).

Next Steps

Review of 2023 data submissions is expected in the coming months. If evidence is later discovered proving an HCSA was operating in Colorado during the reporting period, and did not submit data to the Division, the Division may initiate enforcement actions against non-reporting HCSAs. The Division is not anticipating updates to this 2023 report. Finalized submission materials, excluding confidential information, will be posted to the Division's website for interested parties to download. Annually, HCSA data submissions are due to the Division on March 1st of each year with the associated report published by October 1st of the same year.

If there is evidence that a HCSA is operating in Colorado but is not included in this report, please contact Leilani Russell (<u>Leilani.Russell@state.co.us</u>).

⁹Due to ongoing litigation relating to HCSA entities and regarding the reporting requirements, the Division will not comment on individual HCSA submissions for the 2024 reporting cycle.

Appendices

Appendix A: Associated Legislation, Regulation, and Division Information

- Colorado House Bill 22-1269
- Division of Insurance Emergency Regulation 22-E-20
- Division of Insurance <u>Regulation 4-10-01</u>, including an attestation
- The Division's <u>consumer complaint portal</u> and <u>information on how to ask a question or</u> file a complaint
- The Division's web page dedicated to House Bill 22-1269

2023 Reporting Template: The annual reporting template all HCSAs submit to the Division can be downloaded from the Division's website:

https://docs.google.com/spreadsheets/d/1B0yM0Oyhj0gNaQk9YDsTTM4udHCVfyfcZDNKnApJWVs

About the Division of Insurance: The Colorado Division of Insurance, part of the Department of Regulatory Agencies (DORA), regulates the insurance industry and assists consumers and other stakeholders with insurance issues. Visit <u>doi.colorado.gov</u> for more information or call 303-894-7499 / toll free 800-930-3745.

About DORA: DORA is dedicated to preserving the integrity of the marketplace and is committed to promoting a fair and competitive business environment in Colorado. Consumer protection is our mission. Visit <u>dora.colorado.gov</u> for more information or call 303-894-7855 / toll free 800-886-7675.

Appendix B: Regulatory Definitions of Terms Related to HCSA Reporting

The following definitions related to Health Care Sharing Plans and Arrangements can be found on Regulation 4-10-01 and are used by the HCSAs to report to the Division.

"Administrative expenses" shall mean costs incurred to operate and support the functioning of the health care sharing plan or arrangement. This includes but is not limited to bank fees, staff salaries, data processing, sales, management of health care expense submissions, marketing, outreach, and enrollment efforts. This includes fees, commissions, and remuneration paid to contractors or third parties that acted on behalf of the HCSPA to facilitate administrative operations.

"CORA" shall mean the Colorado Open Records Act (§ 24-72-201, et seq, C.R.S.).

"Coloradans" shall mean residents of Colorado during the reporting period.

"Filing date" shall mean for the purposes of this regulation, the day after the HCSPR filing is received at the Division.

- "Health care costs" or "health care expenses" shall mean any amount billed by a health care provider for health care services or related products or by a pharmacy.
- "Health care provider" shall have the same meaning as found at § 10-16-102(56), C.R.S. "Health care provider" includes telehealth and direct primary care providers for the purposes of this regulation.
- "Health care services" means any services included in or incidental to the furnishing of medical, behavioral, mental health, or substance use disorder; dental, or optometric care; hospitalization; or nursing home care to an individual, as well as the furnishing to any person of any other services for the purpose of preventing, alleviating, curing, or healing human physical illness or injury, or behavioral, mental health, or substance use disorder. "Health-care services" includes the rendering of the services through the use of telehealth, as defined in § 10-16-123 (4)(e), C.R.S.
- "Health care sharing plan" or "health care sharing arrangement" or "plan" or "arrangement" or "HCSPA" shall mean any organization that offers or markets products to facilitate payment or reimbursement of health-care costs or services for one (1) or more residents of Colorado. This does not include direct primary care agreements as defined in § 6-23-101, C.R.S.; consumer payment plans offered directly between a provider and patient (or patient's responsible party); businesses used to facilitate the plan's operations such as reimbursement handling, cost containment vendors, data processing; and crowdfunded sources that do not require ongoing membership fees, share requirements, or dues for the purposes of payment for and/or reimbursement of health care services.
- "Health Care Sharing Report" or "HCSR" shall mean the report required to be filed with the Commissioner pursuant to § 10-16-107.4(1), C.R.S.
- "Health Care Sharing Plan or Arrangement Reporting template" or "template" shall mean the data reporting template created and distributed by the Division for the purposes of collecting data per § 10-16-107.4, C.R.S.
- "Insurance producer" or "producer" shall have the same meaning as found at § 10-2-103(6), C.R.S., with the exception that for the purposes of this regulation it does not include § 10-2-103(6)(b), C.R.S."
- "**Product(s)**" means, for the purposes of this regulation, the services covered as a package under a membership plan, tier, or level.
- "Program expenses" shall mean any service by the HCSPA or its contractors that, while not direct medical care, contributes to the care and overall experiences of HCSPA's participants. This includes but is not limited to coaching and wellness programs, care navigation, care coordination, medical review, quality improvement efforts, cost containment, reimbursement handling, and bill negotiations. This includes fees, commissions, and remuneration paid to contractors that acted on behalf of the HCPA to facilitate program expenses.

"**Third party**" shall mean contractors that are associated with or assist the plan or arrangement in offering or enrolling Colorado residents as participants in the plan or arrangement.

Appendix C: List of Health Care Sharing Arrangements Operating in Colorado

List of HCSAs that offered plans or arrangements in Colorado in 2023 and reported data to the Division

Altrua Ministries
Christian Care Ministry, dba Medi-Share
Christian Healthcare Ministries
Impact Health Sharing
Jericho Share
Knew Health
Liberty HealthShare
Logos Missions, Inc, dba Christian Mutual Medical Assistance
OneShare
Samaritan Ministries International

Sedera Medical Cost Sharing Community

Sedera, Inc.

Share HealthCare

Solidarity

Unite Health Share Ministries, dba UHSM

Universal Health Fellowship

Zion HealthShare

Appendix D: Services and Pre-existing Conditions Excluded from Sharing by Some HCSAs

For more information about exclusion or coverage of services for any particular HCSA review the specific membership guidelines from the HCSA.

The following are health care services that are excluded from sharing across some of the organizations that reported data to the Division. This is not an exhaustive list.

- Acupuncture
- ADHD treatments
- Contraception coverage
- Cosmetic surgery
- Dental coverage
- Diabetic medication and supplies
- Eye care
- Fertility/Infertility care
- Gender affirming care
- Maternity care unless the mother has been a member for 12 months without changing to a lower cost program
- Medications used to support chronic or pre-existing health conditions
- Mental health treatment
- Routine and preventive care including, but not limited to, all well-patient care and screening tests and procedures
- Substance use disorder treatment
- Vaccinations and/or Immunizations
- Weight Management treatment or procedures

The following are a list of conditions that some of the HCSAs reported as pre-existing and therefore ineligible for sharing, or had limitations on sharing based on the HCSA's specific guidelines. This is not an exhaustive list.

- ALS
- Alzheimer's Disease
- Aneurysm
- Asthma
- Autism Spectrum Disorder
- Cancer
- Cerebral Palsy
- Congenital Conditions
- Congestive Heart Failure
- COPD
- Cystic Fibrosis
- Dementia
- Diabetes Type I and II

- Down's Syndrome
- Endometriosis
- Experimental treatments
- Heart Palpitations
- Hepatitis
- Hypertension
- HIV/AIDS
- Lupus
- Lyme's Disease
- Multiple Sclerosis
- Muscular Dystrophy
- Rheumatoid Arthritis
- Sickle-Cell Disease
- Sleep Apnea

Appendix E: 2023 Financial Information Table 1

For HCSAs with different percentages reported across their multiple products/programs the high and low range of the reported values are displayed in this table.

Please review the data limitations section included in this report for additional context about the financial data reported to the Division.

Organization	Total amount of fees, dues, shares, contributions, or other payments collected from individuals, Colorado employer groups, or others who participated in the product	The percentage of fees, dues, shares, contributions, or other payments from Colorado participants in this product retained by the plan or arrangement for administrative expenses	The percentage of fees, dues, contributions, or other payments from Colorado participants in this product retained by the plan or arrangement for program expenses	Total dollar amount of health-care costs or services that were incurred by the participant and submitted by or on behalf of the participant for sharing	Total dollar amount of requests for sharing of Colorado participants' health-care costs or services that qualified for sharing excluding any amounts that the participants incurring the health-care costs or services must pay before receiving sharing amounts under the member guidelines
Altrua Ministries ¹⁰	\$835,931.28	-	-	-	-
Christian Care Ministry, dba Medi-Share ¹¹	\$27,706,631.00	-	-	-	-
Christian Healthcare Ministries	\$22,276,198.01	4.80%	5.60%	\$55,763,555.94	\$46,056,456.71
Impact Health Sharing	\$511,485.00	34.70%	14.60%	\$1,116,220.00	\$177,337.53
Jericho Share	\$1,219,599.95	0%-82%	0%-82%	\$1,079,940.20	\$80,843.46
Knew Health	\$306,938.94	33%	20%	\$200,827.89	\$98,530.56

¹⁰Data from these HCSAs were excluded from the financial analysis presented in this report due to inconsistencies or missing data. Where data were missing from a submission " - " is used.

¹¹ Ibid

Organization	Total amount of fees, dues, shares, contributions, or other payments collected from individuals, Colorado employer groups, or others who participated in the product	The percentage of fees, dues, shares, contributions, or other payments from Colorado participants in this product retained by the plan or arrangement for administrative expenses	The percentage of fees, dues, contributions, or other payments from Colorado participants in this product retained by the plan or arrangement for program expenses	Total dollar amount of health-care costs or services that were incurred by the participant and submitted by or on behalf of the participant for sharing	Total dollar amount of requests for sharing of Colorado participants' health-care costs or services that qualified for sharing excluding any amounts that the participants incurring the health-care costs or services must pay before receiving sharing amounts under the member guidelines
Liberty HealthShare ¹²	\$9,563,957.00	-	-	-	-
Logos Missions, Inc, dba Christian Mutual Medical Assistance	\$199,300.00	10.00%	22.00%	\$128,393.20	\$64,905.36
OneShare ¹³	\$4,275,772.68	-			-
Samaritan Ministries International ¹⁴	\$16,012,373.00	-	-	-	-
Sedera Medical Cost Sharing Community	\$5,916,748.45	First three months: 62%; after that: 12%	23%	\$6,904,090.50	\$5,455,787.61
Sedera, Inc.	\$1,523,542.20	First three months: 62%; after that: 12%	′ ' ' ' ' ' ' ' ' ' ' ' ' ' ' ' ' ' '		\$803,148.60
Share HealthCare	\$54,297.00	33.6% - 38.4%	62.2% - 66.4%	\$778.85	\$266.00
Solidarity	\$825,220.00	8%	32%	\$3,033,948.59	\$547,717.95

¹² Data from these HCSAs were excluded from the financial analysis presented in this report due to inconsistencies or missing data. Where data were missing from a submission " - " is used.

¹³ Ibid

¹⁴ Ibid

Organization	Total amount of fees, dues, shares, contributions, or other payments collected from individuals, Colorado employer groups, or others who participated in the product	The percentage of fees, dues, shares, contributions, or other payments from Colorado participants in this product retained by the plan or arrangement for administrative expenses	The percentage of fees, dues, contributions, or other payments from Colorado participants in this product retained by the plan or arrangement for program expenses	Total dollar amount of health-care costs or services that were incurred by the participant and submitted by or on behalf of the participant for sharing	Total dollar amount of requests for sharing of Colorado participants' health-care costs or services that qualified for sharing excluding any amounts that the participants incurring the health-care costs or services must pay before receiving sharing amounts under the member guidelines
Unite Health Share Ministries ¹⁵	Redacted	Redacted	Redacted	Redacted	Redacted
Universal Health Fellowship	\$1,652,026.00	36% - 50%	34% - 60%	\$2,012,926.35	\$167,719.53
Zion HealthShare	\$4,989,513.17	13.40%	3.20%	\$24,913,494.41	\$5,137,373.18

¹⁵ Unite Health Share Ministries (UHSM) requested that data supplied on tabs 2 and 3 of the reporting template, and therefore what would be displayed on this table, be confidential.

Appendix F: 2023 Financial Information Table 2

Organization	Total dollar amount of payments made to providers for Colorado participants' health care costs and services	Total dollar amount of health-care costs or services that were incurred by the participant and submitted by or on behalf of the participant for sharing	Total amount of Colorado participants' health-care costs and services submitted in 2023 that qualify for sharing pursuant to the plan/arrangement's criteria but that were not shared or paid by 12/31/2023, excluding any amounts that the participants incurring the health-care costs or services must pay before receiving sharing amounts under the member guidelines ¹⁶	Total number of requests by or on behalf of the Colorado participants' for sharing of healthcare costs or services incurred by the participant
Altrua Ministries ¹⁷	-	-	-	-
Christian Care Ministry, dba Medi-Share ¹⁸	-	-	-	-
Christian Healthcare Ministries	\$5,013,145.76	\$16,752,703.49	\$11,573.42	17,188
Impact Health Sharing	\$148,457.56	\$28,879.97	\$0.00	863
Jericho Share	\$80,843.46	\$0.00	\$57,226.13	1,724
Knew Health	\$0.00	\$98,530.56	\$1,570.56	71
Liberty HealthShare ¹⁹	-		-	
Logos Missions, Inc, dba Christian Mutual Medical Assistance	\$8,983.92	\$48,288.89	\$7,632.55	262

¹⁶ The values reported in this column exclude any amounts that the participants incurring the health-care costs or services must pay before share requests are approved under the plan or arrangement

¹⁷Data from these HCSAs were excluded from the financial analysis presented in this report due to inconsistencies or missing data. Where data were missing from a submission " - " is used.

¹⁸ Ibid

¹⁹ Ibid

Organization	Total dollar amount of payments made to providers for Colorado participants' health care costs and services	Total dollar amount of health-care costs or services that were incurred by the participant and submitted by or on behalf of the participant for sharing	Total amount of Colorado participants' health-care costs and services submitted in 2023 that qualify for sharing pursuant to the plan/arrangement's criteria but that were not shared or paid by 12/31/2023, excluding any amounts that the participants incurring the health-care costs or services must pay before receiving sharing amounts under the member guidelines ¹⁶	Total number of requests by or on behalf of the Colorado participants' for sharing of healthcare costs or services incurred by the participant
OneShare ²⁰	-	-	-	-
Samaritan Ministries International ²¹	-	-	-	-
Sedera Medical Cost Sharing Community	\$4,613,502.51	\$842,285.10	\$714,919.60	3,374
Sedera, Inc.	\$678,527.10	\$124,621.50	\$0.00	324
Share HealthCare	\$0.00	\$266.00	\$0.00	2
Solidarity	\$440,173.93	\$107,544.02	-	2,806
Unite Health Share Ministries ²²	Redacted	Redacted	Redacted	Redacted
Universal Health Fellowship	\$150,947.58	\$16,771.95	\$6,850.75	1,837
Zion HealthShare	\$4,167,983.89	\$969,389.29	\$31.00	2,501

²⁰ Ibid

²¹ Ibid

²² Unite Health Share Ministries (UHSM) requested that data supplied on tabs 2 and 3 of the reporting template, and therefore what would be displayed on this table, be confidential. Their data is excluded from the financial analysis presented in this report.

Appendix G: 2023 Data on share request denials and appeals

For HCSAs with different percentages reported across their multiple products/programs the high and low range of the reported values are displayed in this table.

Where a HCSA has not supplied data to the Division, " - " is used.

Where a HCSA has indicated that a required data element is not applicable, "N/A" is used.

Organization	Total number of share requests, for Colorado participants, that were denied (not shared) because they were not eligible for sharing according to the organization's guidelines	Total number of appeals of denied sharing requests for Colorado participants' incurred health-care costs or services	Total number of appeals requests that were later approved for sharing for Colorado participants' incurred health-care costs or services	Percentage of total number of requests denied compared to the total number of Colorado participants share requests submitted	Percentage of total number of requests denied compared to the total number of appeals for sharing that were "denied" (not shared) for Colorado participants
Altrua Ministries ²³	-	-	-	-	-
Christian Care Ministry, dba Medi-Share ²⁴	-	-	-	-	-
Christian Healthcare Ministries	4,585	5	1	0.27%	0%
Impact Health Sharing	88	0	0	10.20%	0%
Jericho Share	47	4	-	0% - 17.00%	0% - 33.00%
Knew Health	0	0	0	N/A	N/A
Liberty HealthShare ²⁵	-	-	-	-	-

²³ Data from these HCSAs were excluded from the financial analysis presented in this report due to inconsistencies or missing data. Where data were missing from a submission " - " is used.

²⁴ Ibid.

²⁵ Ibid.

Organization	Total number of share requests, for Colorado participants, that were denied (not shared) because they were not eligible for sharing according to the organization's guidelines	Total number of appeals of denied sharing requests for Colorado participants' incurred health-care costs or services	Total number of appeals requests that were later approved for sharing for Colorado participants' incurred health-care costs or services	Percentage of total number of requests denied compared to the total number of Colorado participants share requests submitted	Percentage of total number of requests denied compared to the total number of appeals for sharing that were "denied" (not shared) for Colorado participants
Logos Missions, Inc, dba Christian Mutual Medical Assistance	19	0	0	0% - 8.00%	0%
OneShare ²⁶	-	-	-	-	-
Samaritan Ministries International ²⁷	-	-	-	-	-
Sedera Medical Cost Sharing Community	271	2	2	7.60% - 8.20%	0%
Sedera, Inc.	22	0	0	0% - 6.80%	0%
Share HealthCare	1	0	0	50.00%	0%
Solidarity	695	-	-	24.00%	-
Unite Health Share Ministries ²⁸	Redacted	Redacted	Redacted	Redacted	Redacted
Universal Health Fellowship	307	16	4	16.20%	5.20%
Zion HealthShare	196	23	10	5.80% - 9.00%	7.00% - 14.00%

²⁶ Data from these HCSAs were excluded from the financial analysis presented in this report due to inconsistencies or missing data. Where data were missing from a submission " - " is used.

Ibid.
 UHSM requested that data supplied on tabs 2 and 3 of the reporting template be confidential.

Appendix H: Additional 2023 Data from the Health Care Sharing Plan Reporting Template Where a HCSA has not supplied data to the Division, " - " is used.

Where a HCSA has indicated that a required data element is not applicable, "N/A" is used.

Organization	The total number of employer groups in Colorado that participated in this product	Number of contracts entered into with health care service providers providing services for Colorado participants for this product	Estimated number of individual plan/arrangement participants anticipated in Colorado in 2024	Estimated number of households plan/arrangement participants anticipated in Colorado in 2024	Estimated number of employer groups plan/arrangement participants anticipated in Colorado in 2024	Estimated number of individual Colorado participants associated with the employers in in 2024
Altrua Ministries	0	-	264	141	0	0
Christian Care Ministry, dba Medi-Share	34	-	12,951	4,934	-	-
Christian Healthcare Ministries	24	13	10,382	4,806	24	289
Impact Health Sharing	0	0	410	18,000	0	0
Jericho Share	0	1	2,750	1,801	-	-
Knew Health	1	0	375	200	1	2
Liberty HealthShare	2	11	1,350	2,807	3	6
Logos Missions, Inc, dba Christian Mutual Medical Assistance	0	0	230	N/A	0	0
OneShare	-	-	2,116	1,098	0	0

Organization	The total number of employer groups in Colorado that participated in this product	Number of contracts entered into with health care service providers providing services for Colorado participants for this product	Estimated number of individual plan/arrangement participants anticipated in Colorado in 2024	Estimated number of households plan/arrangement participants anticipated in Colorado in 2024	Estimated number of employer groups plan/arrangement participants anticipated in Colorado in 2024	Estimated number of individual Colorado participants associated with the employers in in 2024
Samaritan Ministries International	17	0	11,320	3,033	15	183
Sedera Medical Cost Sharing Community	345	1	2,114	966	66	285
Sedera, Inc.	1	1	595	547	1	72
Share HealthCare	0	0	70	35	5	2
Solidarity	N/A	N/A	675	300	0	0
Unite Health Share Ministries ²⁹	Redacted	Redacted	Redacted	Redacted	Redacted	Redacted
Universal Health Fellowship	N/A	0	834	596	N/A	N/A
Zion HealthShare	0	1	5,267	2,802	0	0

²⁹ UHSM requested that data supplied on tabs 2 and 3 of the reporting template be confidential.

Appendix I: Number of HCSAs Operating in each State³⁰

State	Number of HCSAs Operating in 2023	State	Number of HCSAs Operating in 2023	State	Number of HCSAs Operating in 2023
Alabama	11	Louisiana	11	Ohio	10
Alaska	8	Maine	10	Oklahoma	10
Arizona	11	Maryland	8	Oregon	10
Arkansas	11	Massachusetts	9	Pennsylvania	8
California	11	Michigan	11	Rhode Island	10
Colorado	11	Minnesota	10	South Carolina	11
Connecticut	9	Mississippi	11	South Dakota	11
Delaware	11	Missouri	10	Tennessee	11
Florida	11	Montana	9	Texas	11
Georgia	11	Nebraska	11	Utah	11
Hawaii	8	Nevada	10	Vermont	7
Idaho	11	New Hampshire	10	Virginia	11
Illinois	9	New Jersey	10	Washington	7
Indiana	11	New Mexico	10	West Virginia	10
Iowa	9	New York	9	Wisconsin	11
Kansas	11	North Carolina	11	Wyoming	11
Kentucky	10	North Dakota	10		

³⁰ Information from six HCSAs are not included in this table. One HCSA asked for their data submitted on the template to remain confidential and five did not submit these data following regulation 4-10-01. Due to ongoing litigation relating to HCSA entities and regarding the reporting requirements, the Division will not comment on individual HCSA submissions for the 2024 reporting cycle.