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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 2024, the Division used the infrastructure implemented for previous years' data collection efforts and regulation 4-10-01. This included three 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 HCSAs, 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 three 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.

By April 30, 2025, twenty HCSAs submitted data for the 2024 calendar year⁴. This is an increase in the number of HCSAs that reported compared to previous years' reports. Division staff

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.

⁴ Due to ongoing litigation relating to HCSA entities and regarding the reporting requirements, the Division will not comment on individual HCSA submissions for the 2025 reporting cycle (2024 calendar year) covered in this report.

reviewed submissions for completeness and followed up with HCSAs if materials were missing or data elements did not appear to follow Section 10-16-107.4 CRS and regulation 4-10-01.

Summary of Findings

Twenty 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 data from HCSAs that reported in accordance with <u>Regulation 4-10-01</u> and has also 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. Some HCSAs requested that part of their submission be kept confidential. Where "Redacted" is displayed the data were submitted to the Division but redacted from display in the report to reflect the confidential request of those HCSAs. These redacted data were used in summary statistics. 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 data from HCSAs that reported in accordance with Regulation 4-10-01 and has also noted this in the footnotes.

Membership

Presented in Table 1 is a summary enrollment related data for each HCSA in 2024.

Table 1. 2024 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 ⁵ | Redacted | Redacted | Redacted | Redacted | Redacted |
| Christian Care Ministry, dba Medi-Share ⁶ | Redacted | Redacted | Redacted | Redacted | Redacted |
| Christian Healthcare Ministries | 10,306 | 351,493 | 4,560 | 284 | N/A |
| ClearShare Health | 397 | 13,614 | 173 | 7 | 397 |

⁵ Altrua Ministries requested that data supplied on the reporting template, and therefore what would be displayed on this table, be confidential.

⁶ Christian Care Ministry requested that data supplied on the reporting template, and therefore what would be displayed on this table, be confidential.

| 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 |
|---|--|--|---|---|---|
| Redacted | 485 | 9,001 | 241 | N/A | N/A |
| Impact Health Sharing | 355 | 14,084 | 203 | 21 | 355 |
| Jericho Share | 677 | 9,471 | 423 | N/A | 677 |
| Knew Health | 309 | 4,757 | 156 | 2 | N/A |
| Liberty HealthShare ⁷ | 2,334 | 43,388 | 1,110 | 6 | Redacted |
| Logos Missions, Inc, dba Christian Mutual Medical Assistance | 187 | 21,473 | 96 | N/A | N/A |
| netWell | 282 | 6,200 | 107 | N/A | 275 |
| OneShare Health8 | 1,738 | 23,430 | 869 | N/A | Redacted |
| Samaritan Ministries International ⁹ | 12,798 | 349,396 | 3,443 | 226 | Redacted |
| Sedera Medical Cost Sharing Community | 2,622 | 35,451 | 1,197 | 340 | 1,594 |
| Sedera, Inc. | 518 | 2,466 | 255 | 55 | 507 |
| Share HealthCare | 41 | 1,258 | 19 | N/A | 0 |
| Solidarity | 315 | 14,233 | 127 | N/A | 0 |
| Unite Health Share Ministries ¹⁰ | Redacted | Redacted | Redacted | Redacted | Redacted |
| Universal Health Fellowship ¹¹ | Redacted | Redacted | Redacted | N/A | Redacted |
| Zion HealthShare | 5,467 | 58,057 | 2,839 | 0 | N/A |
| Total | 57,358 | 1,428,111 | 23,583 | 1,148 | 5,709 |

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⁷ Liberty HealthShare requested some of the data supplied on the reporting template, and therefore some of what would be displayed on this table, be confidential.

⁸ OneShare Health requested some of the data supplied on the reporting template, and therefore some of what would be displayed on this table, be confidential.

⁹ Samaritan Ministries International requested some of the data supplied on the reporting template, and therefore what would be displayed on this table, be confidential.

¹⁰ 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.

¹¹ Universal Health Fellowship requested that data supplied on the reporting template, and therefore what would be displayed on this table, be confidential.

In 2024, twenty HCSAs reported a total membership of 57,358 Coloradans across 23,583 households, and 1,428,111 national members. Colorado HCSA membership numbers represent slightly over 4% of national enrollment in these HCSAs. In comparison, Colorado's 2023 estimated population¹² is 1.8% of the national population.¹³ Actual HCSA enrollment in Colorado is likely different than reported here as other HCSAs could be operating in Colorado but have not reported data to the Division.

Nine of the twenty HCSAs reported Colorado employer groups that facilitated all or some of their employees' monthly share contributions in 2024. In total, 1,148 HCSA members had all or some of their monthly share contributions facilitated by an employer or a family member's employer. Of those employers whose enrollment information was submitted on the reporting template 80% of employers facilitated monthly share contributions for less than 10 members per employer.

Financial Information

Nineteen HCSAs reported the required financial information to the Division by the time this report was drafted. Seven HCSAs requested that some or all of their financial information be kept confidential so these data are not displayed in the report for the specific HCSAs but these data are included in the aggregate information provided in Table 2.

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 nineteen HCSAs collected \$91,739,589 in total fees, dues, shares, contributions, and other payments from members in 2024.

HCSAs are also required to report on the dollar amount of healthcare costs submitted for their members' sharing requests; the dollar amount of those submitted healthcare costs that are determined eligible for sharing based on the HCSA's specific member guidelines; the dollar amount paid or shared to cover healthcare expenses the HCSA determines are eligible for sharing; and any eligible amount left unpaid by December 31, 2024. A total of \$248,635,906 in healthcare costs were submitted for sharing by members of the nineteen 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 nineteen HCSAs reported that \$135,701,992 of members' total 2024 health care costs were determined eligible for sharing. Of the \$135,701,992

¹² This is the most recent year data were available. Colorado State Demography office [Population Estimates by Age] Retrieved from: https://demography.dola.colorado.gov/

¹³ United States Census Bureau. [U.S. Population Estimated at 334,233,854 on Jan. 1, 2023]. Retrieved from: https://www.census.gov/library/stories/2022/12/happy-new-year-2023.html

determined by the HCSAs to be eligible for sharing \$87,354,626 in healthcare costs or services were paid by the HCSAs either directly to providers or to members. How the \$87,354,626 in payments were disbursed varied across HCSAs with no single uniform business practice.

Table 2. Aggregate 2024 share contributions, share requests, and payments made for Colorado members¹⁴

| | Share contributions collected/ facilitated from individuals, Colorado employer groups, or others | Aggregate healthcare costs submitted for sharing requests | Aggregate submitted healthcare costs that were determined to be eligible for sharing | Total dollar amount paid or shared for eligible healthcare expenses | Total amount of eligible healthcare expenses not yet paid or shared by 12/31/2024 |
|-------|--|---|--|--|---|
| TOTAL | \$91,739,589 | \$248,635,906 | \$135,701,992 | \$87,354,626 | \$7,925,762 |

Actual health care costs of Colorado members were likely different than the \$248,635,906 HCSAs reported as some bills/share requests do not include costs for benefits excluded from sharing and were not submitted by the member or their medical provider. Nor do the amounts submitted to the Division include the amounts members need to pay out-of-pocket for a medical need before being eligible for sharing. This is sometimes referred to as an "Initial Unshareable Amount" or "Annual Unshared Amount" and the amount varies across HCSAs and sometimes across the products offered by a single HCSA.

The guidelines of eighteen HCSAs explicitly state that members must use or are obligated to pursue¹⁵ 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 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 suggests that members first request

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¹⁴ A breakdown by HCSA of these data can be found in the Appendices

¹⁵ 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."

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 and Use of Insurance Producers

Eight HCSAs reported that 657 producers enrolled 5,709 members in these eight HCSAs. The range of Colorado membership enrolled via producers varies from 1 member enrolled through a producer for one HCSA to 1,594 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 657 producers across this subset of HCSAs is not a unique count of producers and likely includes double counting.

Five of the eight HCSAs that reported an association with producers also reported on the "total commission, fees, or remuneration paid in [2024] to producers for: marketing, promoting, or enrolling Colorado participants". Producers were paid a total of \$969,913 in 2024 by the five HCSAs. The other three HCSAs either did not report this data point or requested it be kept confidential. 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. It is possible that more than the eight HCSAs noted above work with producers to enroll members and that more than the five HCSAs noted above paid producers for marketing, promoting, and enrolling members.

Thirteen HCSAs paid third parties \$2,758,895 for "marketing, promoting, or enrolling participants in a plan or arrangement to Colorado participants" and eleven HCSAs paid third parties \$13,506,917 for "operating, managing, or administering a plan or arrangement offered by the [HCSA]."

Nineteen 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>.

Division staff review marketing materials submitted by HCSAs to understand if the commercial marketing of any HCSA (whether by the HCSA and/or their third party affiliates such as paid

insurance brokers) can lead to consumer confusion with commercial health insurance. Examples of potentially confusing marketing language found in HCSA consumer facing materials include:

- Use of insurance terms that mimic commercial health insurance plans, such as: "premium," "deductible" and "catastrophic";
- Use of metal tier plan names mimicking commercial health insurance
 - At least two HCSAs offer "Gold, "Silver, and "Bronze" plans
- Ads or social media posts implying guaranteed payment of health care bills when sharing or reimbursement by fellow members is voluntary and can not be guaranteed;
 - In marketing materials from 1 HCSA: "100% of Eligible Medical Bills Up to \$1,000,000 Per Incident,"
- References to "Open Enrollment" in advertisements during the ACA's open enrollment period mimicking commercial health insurance plans when "Open Enrollment" does not apply to HCSAs as their members can enroll at any time;
 - From an HCSA blog post: "Open Enrollment: Time to Rethink Healthcare. Open enrollment is the annual period when individuals can enroll in or make changes to their health insurance coverage."
- References to the HCSA being "ACA compliant" which may be a reference to the ACA's individual mandate (which is no longer enforced)¹⁶ but could be confused with being in compliance with the ACA's coverage requirements, which HCSAs are not.
 - Internet search for one HCSA noted on that HCSA's website: "How does Health Sharing Work? [HCSA name] is an ACA compliant healthcare sharing ministry whose members pay medical expenses through direct member-to-member sharing via ..."

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 collect information on individual HCSA members, employers, or producers.

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.

¹⁶ Internal Revenue Service. [Questions and answers on the individual shared responsibility] Retrieved from: https://www.irs.gov/affordable-care-act/individuals-and-families/questions-and-answers-on-the-individual-shared-responsibility-provision

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 <u>consumer portal</u>. Information about filing a complaint can be found on <u>the 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

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.

Finalized submission materials, excluding confidential information, will be posted to the Division's website for interested parties to download as allowable.

Annually, HCSA data submissions are due to the Division on March 1st of each year with the associated report published by October of the same year. The next data submission is due to the Division on March 1, 2026.

If there is evidence that a HCSA is operating in Colorado but is not included in this report, please contact the Division at <u>dora insurance@state.co.us</u> and mention "Health Care Sharing Plans or Arrangements" in the subject line or body of the email.

Appendices

Appendix A: Associated Legislation, Regulation, and Division Information

- Colorado House Bill 22-1269
- Division of Insurance Emergency Regulation 22-E-20
 - Materials for public meetings ahead of the adoption of the emergency regulation
- Division of Insurance Regulation 4-10-01, including an attestation
- The Division's <u>consumer complaint portal</u> and <u>information on how to ask a question or file a</u> complaint
- The Division's web page dedicated to House Bill 22-1269
 - o 2021 Summary Report
 - 2022 Summary Report
 - o 2023 Summary Report

2024 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/edit?gid=426146075#gid=426146075

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 known HCSAs that offered plans or arrangements in Colorado in 2024

Altrua Ministries netWell

Christian Care Ministry, dba Medi-Share OneShare Health

Christian Healthcare Ministries Samaritan Ministries International

ClearShare Health Sedera Medical Cost Sharing Community

Crowd Health Sedera, Inc.

Impact Health Sharing Share HealthCare

Jericho Share Solidarity

Knew Health Share Ministries, dba UHSM

Liberty HealthShare Universal Health Fellowship

Logos Missions, Inc, dba Christian Mutual 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.

Abortion

Medical Assistance

- 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: 2024 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.

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. Some HCSAs requested that part of their submission be kept confidential. Where "Redacted" is displayed the data were submitted to the Division but redacted from display in the report to reflect the confidential request of those HCSAs.

| 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 | Redacted | Redacted | Redacted | Redacted | Redacted |
| Christian Care Ministry, dba Medi-Share | Redacted | Redacted | Redacted | Redacted | Redacted |
| Christian Healthcare Ministries | \$19,397,628 | 4.00% | 6.00% | \$54,786,712 | \$44,446,134.29 |
| ClearShare Health | \$748,670 | 38% - 43% | 0.06% -3.78% | \$1,227,909 | \$55,509 |
| Redacted | \$207,184 | 100% | 0% | \$353,195 | \$377,366 |

| 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 | fees, dues, of health care contributions, or other payments from that were incumentation the this product retained by of health care costs or service that were incumentation by the participation and submitted the costs or service that were incumentation by the participation and submitted the costs or service that were incumentation by the participation and submitted the costs or service that were incumentation and the costs of the costs or service that were incumentation and the costs of the co | | 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 |
|---|--|---|--|-------------|--|
| Impact Health Sharing | \$708,800 | 32.00% | 15.00% | \$1,384,600 | \$257,100 |
| Jericho Share | \$588,159 | 0.0% - 73.4% | 0.00% - 81.50% | \$540,940 | \$49,743 |
| Knew Health | \$502,114 | 37% | 7% | \$627,867 | \$133,261 |
| Liberty HealthShare | \$7,912,501 | Redacted | Redacted | Redacted | Redacted |
| Logos Missions, Inc, dba Christian Mutual Medical Assistance | \$220,385 | 7% | 29% | \$149,863 | \$74,792 |
| netWell | \$360,661 | 7% | 35% | \$230,821 | \$87,674 |
| OneShare Health | Redacted | Redacted | Redacted | Redacted | Redacted |
| Samaritan Ministries International | \$16,830,347 | Redacted | Redacted | Redacted | Redacted |
| Sedera Medical Cost Sharing Community | \$4,313,417 | 18% | 25.4%+\$2.50 | \$8,693,399 | \$4,210,943 |
| Sedera, Inc. | \$685,738 | 18% | 25.4%+\$2.50 | \$1,093,919 | \$702,704 |
| Share HealthCare | \$57,648 | 35.60% | - | \$33,007 | \$31,543 |

| 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 |
|----------------------------------|--|---|--|---|--|
| Solidarity | \$562,649 | 10% | 28% | \$575,371 | \$80,369 |
| Unite Health Share Ministries | Redacted | Redacted | Redacted | Redacted | Redacted |
| Universal Health Fellowship | Redacted | Redacted | Redacted | Redacted | Redacted |
| Zion HealthShare | \$4,112,044 | 10.84% | 2.31% | \$12,126,382 | \$7,072,789 |
| TOTAL | \$91,739,589 | N/A | N/A | \$248,635,906 | \$135,701,992 |

Appendix F: 2024 Financial Information Table 2

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. Some HCSAs requested that part of their submission be kept confidential. Where "Redacted" is displayed the data were submitted to the Division but redacted from the report to reflect the confidential request of those HCSAs.

| Organization | Total dollar amount of payments made to providers for Colorado participants' health care costs and services | Total dollar amount of sharing requests facilitated or provided to Colorado participants for health care costs or services | Total amount of Colorado participants' health-care costs and services submitted in 2024 that qualify for sharing but that were not shared or paid by 12/31/2024 ¹⁷ | 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 | Redacted | Redacted | Redacted | Redacted |
| Christian Care Ministry, dba Medi-Share | Redacted | Redacted | Redacted | Redacted |
| Christian Healthcare Ministries | \$5,054,018 | \$17,374,969 | \$69,240 | 17,696 |
| ClearShare Health | \$55,509 | \$0 | \$0 | 564 |
| Redacted | N/A | \$377,366 | \$33,700 | 477 |
| Impact Health Sharing | \$193,900 | \$34,500 | \$54 | 1,074 |
| Jericho Share | \$49,207 | \$536 | \$6,285 | 452 |
| Knew Health | \$7,791 | \$125,470 | \$0 | 141 |
| Liberty HealthShare | Redacted | Redacted | Redacted | Redacted |
| Logos Missions, Inc, dba Christian Mutual Medical Assistance | \$0 | \$42,579 | \$32,213 | 215 |
| netWell | \$29,912 | \$0 | \$0 | - |
| OneShare Health | Redacted | Redacted | Redacted | Redacted |
| Samaritan Ministries International | Redacted | Redacted | Redacted | Redacted |

¹⁷ The full text of the data element reads, "Total amount of Colorado participants' health-care costs and services submitted in 2024 that qualify for sharing pursuant to the plan/arrangement's criteria but that were not shared or paid by 12/31/2024, excluding any amounts that the participants incurring the health-care costs or services must pay before receiving sharing amounts under the member guidelines."

| Organization | Total dollar amount of payments made to providers for Colorado participants' health care costs and services | Total dollar amount of sharing requests facilitated or provided to Colorado participants for health care costs or services | Total amount of Colorado participants' health-care costs and services submitted in 2024 that qualify for sharing but that were not shared or paid by 12/31/2024 ¹⁷ | Total number of requests by or on behalf of the Colorado participants' for sharing of healthcare costs or services incurred by the participant |
|--|---|--|---|---|
| Sedera Medical Cost Sharing Community | N/A | \$4,175,622 | \$35,321 | 3,035 |
| Sedera, Inc. | N/A | \$702,704.24 | \$0 | 427 |
| Share HealthCare | - | \$1,464 | \$0 | 26 |
| Solidarity | \$36,705 | \$1,223 | - | 385 |
| Unite Health Share Ministries | Redacted Redacted Red | | Redacted | Redacted |
| Universal Health Fellowship | Redacted | Redacted | Redacted | Redacted |
| Zion HealthShare | \$5,617,077 | \$1,455,712 | - | 1,501 |
| TOTAL | \$43,504,523.03 | \$43,850,102.99 | \$7,925,762.13 | 103,857 |

Appendix G: 2024 Data on share request denials and appeals

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. Some HCSAs requested that part of their submission be kept confidential. Where "Redacted" is displayed the data were submitted to the Division but redacted from the report to reflect the confidential request of those HCSAs.

| Organization | 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 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 ¹⁸ | Percentage of total number of requests denied compared to the total number of appeals for sharing that were "denied" (not shared) for Colorado participants ¹⁹ |
|--|--|----------|---|--|---|
| Altrua Ministries | Redacted | Redacted | Redacted | Redacted | Redacted |
| Christian Care Ministry, dba Medi-Share | Redacted | Redacted | Redacted | Redacted | Redacted |
| Christian Healthcare Ministries | 1,639 | 2 | 1 | 9.26% | 0.12% |
| ClearShare Health | 136 | 0 | 0 | 24.11% | 0% |
| Redacted | 24 | 0 | 0 | 5.03% | 0% |
| Impact Health Sharing | 232 | 0 | 0 | 21.60% | 0% |
| Jericho Share | 32 | - | - | 7.08% | - |
| Knew Health | 2 | 1 | 1 | 1.42% | 50% |
| Liberty HealthShare | Redacted | Redacted | Redacted | Redacted | Redacted |
| Logos Missions, Inc, dba Christian Mutual Medical Assistance | 20 | 0 | 0 | 9.30% | 0% |
| netWell | - | 2 | 0 | - | - |

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¹⁸ Values reported are the calculated percentage of share requests (summed across all products or programs each HCSA offers) that were denied in 2024

¹⁹ Values reported are the calculated percentage of denials (summed across all products or programs each HCSA offers) that were appealed in 2024.

| 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 ¹⁸ | Percentage of total number of requests denied compared to the total number of appeals for sharing that were "denied" (not shared) for Colorado participants ¹⁹ |
|--|--|--|---|--|---|
| OneShare Health | Redacted | Redacted | Redacted | Redacted | Redacted |
| Samaritan Ministries International | Redacted | Redacted | Redacted | Redacted | Redacted |
| Sedera Medical Cost Sharing Community | 199 | 2 | 1 | 6.56% | 1.01% |
| Sedera, Inc. | 21 | 0 | 0 | 4.92% | 0% |
| Share HealthCare | 0 | 0 | 0 | 0.00% | 0% |
| Solidarity | 179 | 2 | 2 | 46.49% | 1.12% |
| Unite Health Share Ministries | - | Redacted | Redacted | - | - |
| Universal Health Fellowship | Redacted | Redacted | Redacted | Redacted | Redacted |
| Zion HealthShare | 119 | 30 | 11 | 7.93% | 25.21 |
| TOTAL | 13,741 | 111 | 54 | 13.23% | 0.81% |

Appendix H: Additional 2024 Data from the Health Care Sharing Arrangements Reporting Template

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. Some HCSAs requested that part of their submission be kept confidential. Where "Redacted" is displayed the data were submitted to the Division but redacted from the report to reflect the confidential request of those HCSAs.

| 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 2025 | Estimated number of households plan/arrangement participants anticipated in Colorado in 2025 | Estimated number of employer groups plan/arrangement participants anticipated in Colorado in 2025 | Estimated number of individual Colorado participants associated with the employers in in 2025 |
|--|---|---|--|--|---|---|
| Altrua Ministries | Redacted | Redacted | Redacted | Redacted | Redacted | Redacted |
| Christian Care Ministry, dba Medi-Share | Redacted | Redacted | Redacted | Redacted | Redacted | Redacted |
| Christian Healthcare Ministries | 24 | 12 | 10,041 | 4,462 | 24 | 284 |
| ClearShare Health | 2 | 2 | 466 | 204 | 0 | 0 |
| Redacted | N/A | 1 | 700 | 350 | N/A | N/A |
| Impact Health Sharing | 10 | N/A | 390 | 223 | 12 | 25 |
| Jericho Share | N/A | 1 | 746 | 485 | N/A | N/A |
| Knew Health | 1 | N/A | 120 | 83 | 0 | 0 |
| Liberty HealthShare | 2 | 11 | 3,005 | 1,455 | 2 | 6 |
| Logos Missions, Inc, dba Christian Mutual Medical Assistance | N/A | N/A | 230 | N/A | N/A | N/A |
| netWell | N/A | N/A | 320 | 122 | N/A | N/A |

| 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 2025 | Estimated number of households plan/arrangement participants anticipated in Colorado in 2025 | Estimated number of employer groups plan/arrangement participants anticipated in Colorado in 2025 | Estimated number of individual Colorado participants associated with the employers in in 2025 |
|---|---|---|--|--|---|---|
| OneShare Health | N/A | N/A | 1,569 | 1,023 | N/A | N/A |
| Samaritan Ministries International | 19 | N/A | 10,777 | 2,869 | 17 | 180 |
| Sedera Medical Cost Sharing Community | 83 | 1 | 2,884 | 1,407 | 85 | 358 |
| Sedera, Inc. | 1 | 1 | 482 | 237 | 1 | 45 |
| Share HealthCare | 0 | N/A | 54 | 25 | 0 | 0 |
| Solidarity | N/A | N/A | 400 | 175 | N/A | N/A |
| Unite Health Share Ministries | Redacted | Redacted | Redacted | Redacted | Redacted | Redacted |
| Universal Health Fellowship | N/A | Redacted | Redacted | Redacted | Redacted | Redacted |
| Zion HealthShare | 0 | 1 | 6,366 | 3,243 | 0 | 0 |

Appendix I: Number of HCSAs Operating in each State

| State | Number of HCSAs Operating in 2024 | State New York ²⁶ | Number of HCSAs Operating in 2024 | State Wisconsin | Number of HCSAs Operating in 2024 |
|--------------------------|--------------------------------------|---------------------------------|--------------------------------------|----------------------------|--------------------------------------|
| Kansas Alabama | 28 | North Carolina Louisiana | 28 | Wyoming Onio | 79 |
| Kentucky Alaska | 19 | North Dakota Maine | 18 | Oklahoma | 19 |
| Arizona | 20 | Maryland | 14 | Oregon | 19 |
| Arkansas | 20 | Massachusetts | 17 | Pennsylvania ²⁰ | 15 |
| California ²¹ | 19 | Michigan | 20 | Rhode Island | 18 |
| Colorado | 20 | Minnesota | 19 | South Carolina | 20 |
| Connecticut | 18 | Mississippi | 20 | South Dakota | 20 |
| Delaware | 20 | Missouri | 19 | Tennessee | 20 |
| Florida | 20 | Montana | 17 | Texas | 20 |
| Georgia | 20 | Nebraska | 20 | Utah | 20 |
| Hawaii | 17 | Nevada | 19 | Vermont ²² | 14 |
| Idaho | 20 | New Hampshire | 17 | Virginia | 20 |
| Illinois ²³ | 18 | New Jersey | 18 | Washington ²⁴ | 12 |
| Indiana | 20 | New Mexico ²⁵ | 16 | West Virginia | 19 |

²⁰ At least 1 HCSA in this state has at least 1 active member but the HCSA(s) does not enroll new members

²¹ Ibid.

²² Ibid. ²³ Ibid. ²⁴ Ibid. ²⁵ Ibid.

| State | Number of HCSAs Operating in 2024 | State | Number of HCSAs Operating in 2024 | State | Number of HCSAs Operating in 2024 |
|----------|--------------------------------------|------------------------|--------------------------------------|-----------|--------------------------------------|
| Iowa | 18 | New York ²⁶ | 17 | Wisconsin | 19 |
| Kansas | 20 | North Carolina | 20 | Wyoming | 20 |
| Kentucky | 19 | North Dakota | 18 | | |

 26 At least 1 HCSA in this state has at least 1 active member but the HCSA(s) does not enroll new members