



March 6, 2023

Via email: [Hauter@ilhousegop.org](mailto:Hauter@ilhousegop.org)

Representative William E Hauter  
207-N Stratton Office Building  
Springfield, IL 62706

Re: Support for House Bill 2580 (Network Adequacy-Specialists)

Dear Representative Hauter,

The Illinois Society of Pathologists (ISP), with the collaboration of the College of American Pathologists (CAP), strongly supports House Bill 2580, requiring network adequacy for hospital-based specialists, inclusive of pathologists.

The ISP and CAP believes health plan network adequacy requirements, enforced by the Department of Insurance, should ensure Illinois patients have 'reasonable and timely access' to in-network hospital-based medical specialists, including pathologists, radiologists, anesthesiologists, and emergency room physicians at in-network facilities and hospitals,

The proposed legislation protects against health carriers' deceptive practices to advertise and offer inadequate health plan networks to Illinois patients, including misrepresenting hospitals and other facilities as in-network, without adhering to requisite and rigorous department of insurance oversight to ensure enrollees actually have access to in-network hospital-based specialists at such facilities.

Illinois would favorably join the list of states with similar statutory requirements for enrollee access to hospital-based specialists, including Louisiana, New Hampshire, Virginia, and Washington State. As a result of these laws, health insurance carriers are strongly incentivized to contract with hospital-based specialists to meet regulatory standards of network adequacy as prescribed by the respective insurance departments, pursuant to these statutory mandates. Such an Illinois requirement applicable to state regulated health plans would provide a fundamental protection for patients who should be entitled to in-network physician services at in-network facilities.

Furthermore, as stated by the American Hospital Association (AHA): “Hospitals and health systems strongly support network-based coverage where the rules for coverage and enrollee out-of-pocket costs are clearly established, and where regulators ensure adequate access points to care. We continue to believe that the best way to protect patients from surprise medical bills is to ensure that every form of comprehensive coverage – including plans regulated under ERISA – are subject to strict network adequacy rules.”<sup>1</sup>

We strongly support the public policy intention of this legislation and the proposed oversight by the Department to ensure health carriers provide adequate and timely access to hospital-based specialists.

Thank you for your consideration and leadership on this issue.

Sincerely,

A handwritten signature in black ink, appearing to read "Rohit Gupta". The signature is fluid and cursive, with the first name "Rohit" being more prominent than the last name "Gupta".

Rohit Gupta, MD, FCAP, President, Illinois Society of Pathologists

cc: Erin O'Brien, Illinois State Medical Society  
Barry Ziman, College of American Pathologists

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<sup>1</sup> <https://www.aha.org/lettercomment/2021-09-01-aha-letter-requirements-related-surprise-billing-part-i-september-1-2021>