

Samaritan™

MINISTRIES

Testimony of Joel Noble
Director of Public Policy, Samaritan Ministries, Int.
In Opposition to HB 585
3-11-2026

Chair and members of the committee,

Samaritan Ministries one of the largest health care sharing ministries (HCSMs) among the one million Americans using health care sharing nationwide. Samaritan has been approved and accredited by the Health Care Sharing Accreditation Board annually since 2022 and is an A+ rated accredited business by the Better Business Bureau.

For over 31 years Samaritan Ministries has been serving its members, as they bear one another's burdens through the health care sharing of billions of dollars of medical expenses. I have been blessed to have been both a member and serving in the health care sharing field for over 24 years.

To our knowledge, in those 31+ years, none of the 500,000+ different members of Samaritan Ministries has ever made a complaint to VT DFR, nor the Department of Insurance, or any regulatory agency in any state. So obviously we are not like insurance.

The language from HB 102, added to HB 585 under the guise of data collection and protecting consumers from bad actors is a misguided piece of legislation about HCSMs. The language redefines HCSMs as unlicensed health insurance as opposed to what we are, communities of believers sharing their burdens with each other in accordance with their faith and will put us under the jurisdiction of DFR.

This grant of unlimited power to the DFR over religious ministries and their non-insurance programs would unfairly burden the religious exercise of these faith communities and infringe upon the First Amendment rights of Vermonters. Additionally, HCSMs are national ministries, who do not operate with separate state structures, with nearly all of us having less than a 100 households in VT, making the cost of compliance onerous.

Overall, the main issue is not reasonable requirements or reporting in itself. Samaritan Ministries values transparency. But HB 102/HB 585 is an attack on religious entities wrapped in a data collection mandate.

If the goal were simply to understand how many Vermonters participate in health care sharing, there are more direct and less burdensome ways to gather that information. Many states, such as Idaho, Wyoming, Iowa, and New Hampshire, accomplish this by reaching out directly to ministries and requesting basic membership numbers.

Previous hearings have revealed that it is more than just data collection. When this language, then in the form of S.132, was being discussed last April in the Senate Finance Committee, the Deputy Director at DFR expressed reluctance toward the bill because DFR did not want to create any "legitimacy" for HCSMs. When asked if she had suggestions, she laughed and said, "Well, I would actually just like to ban

them if we could.”

This was later echoed by Mike Fisher from the Health Care Advocate Office, who stated in his testimony, *“I too, if we could, would vote to ban these things.”*

While DFR may be concerned about legitimizing us, the real concern should be the consumer confusion this legislation will create. HCSMs are **not** insurance. Placing us under DFR, the agency that regulates insurance, will mislead Vermonters into believing that HCSMs **are** insurance.

Health Care Sharing Ministries are already regulated by the Attorney General, who has jurisdiction over all charities and has broader experience balancing constitutional religious liberty interests with consumer protection.

There is a better way for the public to have confidence and transparency regarding HCSMs. Prospective and current members can review:

- Accreditation status.
- Annual 990s available on IRS website and several other websites.
- CMS certification letters.
- IRS 501(c)(3) determination letters.
- Annual audits (available upon request).
- Sharing guidelines published on ministry websites.

These tools already provide strong transparency without infringing on religious freedom.

For these reasons, I respectfully ask that you **do not include the language from HB 102 in HB 585.**

Joel Noble, Director of Public Policy, Samaritan Ministries, Int.