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August 12, 2021

Jane Beyer, Senior Health Policy Advisor  
Washington State Office of the Insurance Commissioner  
P.O. Box 40255  
Olympia, Washington 98504-0255  
Submitted via email to: [rules@oic.wa.gov](mailto:rules@oic.wa.gov)

**RE: First Stakeholder Draft for the Implementation of E2SHB 1477 and consolidated health care rulemaking (R 2021-16)  
Comments from Coordinated Care Corporation, NAIC# 95831**

Dear Ms. Beyer,

Coordinated Care Corporation (“CCC”) appreciates the opportunity to provide feedback to the Office of the Insurance Commissioner (“OIC”) on the first stakeholder draft issued on July 28, 2021 for the implementation of RCW 48.43.735 and ESHB 1196 ( R 2021- 06).

CCC is a member of the Association of Washington Health Plans (“AWHP”) and hereby endorses all suggestions raised in AWHP’s comment letter on this rulemaking. We would also like to reinforce the following:

First, the newly proposed section (WAC 284-170-433 Provider Contracts – Telemedicine) must be removed. Based on our reading, this new section will require all contracts to be updated and refiled. In our opinion, this will create unnecessary administrative burden for carriers and providers to re-issue contracts to all providers to include language specific to telemedicine. No such requirement was put in place following the passage of ESSB 5385 – concerning telemedicine payment parity. Existing provider contracts contain provisions mandating providers to comply with existing laws and regulations. Therefore, we request OIC remove all provisions related to provider contract requirements.

Second, defined terms in the legislation must not be given expansive definition in the stakeholder draft. For example, “audio-only telemedicine” and “established relationship” are defined in RCW. In our view, the defined terms in the legislation are unambiguous and need no further substantiation. Any attempt to expand these definitions may deviate from the legislative intent and result in inconsistencies with state statute.

Thank you for consideration of our comments. Please let me know if you have any questions. You may reach me at [elizabeth.abekah@coordinatedcarehealth.com](mailto:elizabeth.abekah@coordinatedcarehealth.com).

Sincerely,

A handwritten signature in black ink, appearing to read "Liz Abekah".

Liz Abekah  
Compliance Specialist