



**National  
Multiple Sclerosis  
Society**

August 12, 2021

Washington State Office of the Insurance Commissioner  
5000 Capitol Blvd SE  
Tumwater, WA 98501

**RE: Rulemaking R-2021-06 Audio-only Telehealth Stakeholder draft**

Commissioner Kreidler, Jane Beyer, rules staff,

The National Multiple Sclerosis Society thanks the Washington State Office of the Insurance Commissioner (OIC) for the opportunity to provide comments on the Audio-only telehealth stakeholder draft.

We have two areas regarding the stakeholder draft that we seek further clarification on in the rulemaking. With regards to the originating site, RCW 48.53.375(3)(g) states that the “home or any location determined by the individual receiving the service” is defined as the patients originating site. We seek further clarification on how Washingtonians who seek to utilize their plans telehealth services while out of state, can do so with a Washington State provider. As we understand it current provider licensing laws prevent or hinder this service. We see this as a structural barrier creating significant access issues for Washingtonians. We therefor request the OIC seek further clarification within current statute regarding patient originating site while also exploring options such as multistate licensure or interstate credentialing compacts.

The MS Society also asks for further consumer clarification around patient consent for audio-only telehealth to ensure that services that were provide as a normal provision of care, i.e. sharing of lab results, remain unbillable. Conversely, some services which were provided as a courtesy may now be billable services.

If you have any questions regarding the MS Society highlights related to audio-only telehealth, please contact Seth Greiner, Sr. Mgr. Advocacy Washington State & Oregon, at [seth.greiner@nmss.org](mailto:seth.greiner@nmss.org)

Regards,

A handwritten signature in blue ink, appearing to read "Seth Greiner". The signature is stylized and somewhat abstract, with several loops and flourishes.

Seth Greiner  
Sr. Mgr. of Advocacy, Washington State & Oregon  
National Multiple Sclerosis Society