

Office of the Insurance Commissioner  
5000 Capitol Boulevard SE  
Tumwater, WA 98501

*Submitted via electronic mail to RulesCoordinator@oic.wa.gov*

RE: Comments on stakeholder draft for R2021-06

August 12<sup>th</sup>, 2021

To Whom It May Concern:

Planned Parenthood Alliance Advocates – Washington (PPAA) is pleased to submit the following comments in response to the stakeholder draft for R2021-06 (Telemedicine and Audio-only Telemedicine Services), implementing House Bill 1196.

Planned Parenthood is Washington state's largest provider of sexual and reproductive health (SRH) services. Our mission is to increase access to high-quality, affordable services that respect the unique needs of each patient. As part of this mission, we are proud to offer high-quality telemedicine services to our patients. Offering services via telemedicine allows us to better meet the needs of our patients and increases access for patients who might otherwise be unable to access the care they need. As such, PPAA strongly supported the passage of HB 1196 to help ensure that all Washington patients have access to high-quality telemedicine services, including audio-only telemedicine when appropriate.

We appreciate that this rule clarifies provider responsibilities when offering audio-only telemedicine, including the process for obtaining patient consent. In particular, we appreciate the clarification that consent to billing for audio-only services may remain in effect for up to twelve months and that this rule allows providers to obtain consent both verbally and in writing. Both of these clarifications will minimize the impact the consent process has on providers' workflows and allow for better integration into providers' existing processes for obtaining consent for billing, in turn making it easier for providers to improve patient access by offering audio-only services.

Thank you for the opportunity to comment and for your work to improve access to care in Washington State.

Sincerely,

Leslie Edwards  
Public Policy Analyst  
Planned Parenthood Alliance Advocates - Washington