



nami

National Alliance on Mental Illness

Washington

August 31, 2021

Mandy Weeks-Green
Washington State Office of the Insurance Commissioner
P.O. Box 40260 Olympia, WA 98504
Submitted via public comment
Re: Public Comment on CR-101 for R 2021-16

Dear Ms. Weeks-Green,

Thank you for taking the time to review comment on CR-101 for R 2021-16 on behalf of the National Alliance on Mental Illness (NAMI) Washington, the nation's largest grassroots mental health organization dedicated to building better lives for the millions of Americans affected by mental illness and representing thousands of impacted Washingtonians. We also thank you for your work on E2SHB 1477 implementation concerning access to next day appointments required in the legislation.

NAMI Washington is supportive of the R 2021-16 stakeholder draft. Too often NAMI Washington hears from our members that they were unable to find a behavioral health care appointment in the appropriate timeframe for their needs, especially with a provider within their network and particularly in times of needing urgent care. Transparent, weekly updated reports from health plans detailing compliance with next day appointment access is a vital component to accountability and improving access to behavioral health care for the people in our state. Within these reports, it is critical to know when and why a next day appointment was not possible. Weekly reports are an appropriate cadence to monitor health plan compliance especially as inability to access an appointment quickly for urgent behavioral health can lead to devastating and harmful consequences for an individual. We also support the inclusion of establishing a process for ensuring access to next day appointment for urgent, symptomatic behavioral health in an issuer's access plan as a part of promoting network adequacy.

Additionally, as implementation moves forward, we suggest that rulemaking also take appropriate steps to ensure that an individual does not get balanced billed for an urgent behavioral health appointment.

Again, thank you for taking the time to review NAMI Washington's comment.

Warmly,

Katherine Seibel, MSSW
Director of Public Policy and Advocacy