



March 1, 2022

Mr. Michael Walker  
Washington State Office of the Insurance Commissioner  
302 Sid Snyder Ave.  
Olympia, WA 98504  
Submitted via e-mail to: [rulescoordinator@oic.wa.gov](mailto:rulescoordinator@oic.wa.gov)

RE: R 2022-01 Insurance Underwriting Transparency CR-101

Dear Mr. Walker,

On behalf of Cambia Health Solutions family of insurance companies (“Cambia”), including Regence BlueShield, Asuris Northwest Health, and BridgeSpan Health Company, thank you for the opportunity to provide comments on the CR-101 for the insurance underwriting transparency rulemaking.

Based on the information provided in the CR-101 for this rulemaking, it is unclear what types of insurers the OIC’s intends to include in the scope of the regulation. The statutes cited as the authority to adopt these rules could broadly encompass most insurance entities, including health care and disability insurers. It is our understanding the basis for new regulations is stemming from a need for greater transparency within the personal insurance industry. Based on this understanding, we respectfully recommend the OIC expressly state in any draft rule language that the regulation does not apply to a “health carrier” as defined in RCW 48.43.005(28). Health plans have many state and federal rating laws that already apply and provide greater transparency to our members than other types of insurance plans. We are concerned any additional regulations may result in confusion and conflicting provisions. Additionally, we believe it is likely many types of health plans are already meeting the spirit and intent of the proposed rulemaking and could be harmed by a one-size fits all approach to underwriting transparency across the entire insurance industry in Washington.

Thank you for considering our comments as you draft language for this rulemaking. Please let me know if you would like to discuss any of our feedback further. I can be reached at [Jane.Douthit@Regence.com](mailto:Jane.Douthit@Regence.com) or (206) 332-5212.

Sincerely,

A handwritten signature in black ink that reads "Jane Douthit". The signature is written in a cursive, flowing style.

Jane Douthit  
Cambia Health Solutions  
Sr. Public & Regulatory Affairs Specialist