

From: [Merlene S Converse](#)
To: [OIC Rules Coordinator](#)
Cc: [Frankie Kaiser](#)
Subject: Comments on CR-101 R 2022-01 Transparency in Insurance Underwriting
Date: Thursday, April 21, 2022 10:00:47 AM

External Email

Dear Mr. Walker and rulemaking team,

Kaiser Foundation Health Plan of the Northwest, Kaiser Foundation Health Plan of Washington, and Kaiser Foundation Health Plan of Washington Options, Inc. (collectively “Kaiser Permanente”), appreciate the opportunity to provide feedback to the Office of the Insurance Commissioner (“OIC”) on the preproposal statement of inquiry for R 2022-01 Transparency in Insurance Underwriting. Kaiser Permanente is an integrated health care system that covers and cares for more than 760,000 members in Washington State. We are committed to delivering affordable, coordinated, and high-quality care and coverage that supports not only our members but also the communities we serve.

As the OIC determines the types of insurance to include in scope for this rulemaking, we urge the OIC to remove health insurance and health carriers from the scope. Health insurance underwriting is already highly regulated at both the state and federal level. It is unclear what transparency issue the OIC is trying to address for health insurance underwriting.

We look forward to seeing a stakeholder draft of the regulation and will continue to engage in the rulemaking process.

Sincerely,

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