

From: [Jennifer Salemi](#)
To: [OIC Rules Coordinator](#)
Subject: PROPOSED RULE PERTAINING TO HCSM
Date: Tuesday, May 24, 2022 1:49:08 PM
Attachments: [Letter to WA State RE Proposed Regulation.pdf](#)
Importance: High

External Email

Hello,

Attached is our letter regarding Washington State Department of Insurance's proposed rule pertaining to Healthcare Sharing Ministries.

Thank you.

Jennifer Salemi



[Jennifer Salemi](#)

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May 24, 2022

Ms. Jane Beyer
Department of Insurance
PO Box 40260
Olympia, WA 98504-0260

VIA ELECTRONIC DELIVERY TO RULESCOORDINATOR@OIC.WA.GOV

Dear Ms. Beyer:

On behalf of Solidarity HealthShare, a Health Care Sharing Ministry (HCSM) whose sharing guidelines follow the moral and ethical teachings of the Roman Catholic Church, I am pleased to offer the following comments regarding the Department of Insurance's proposed rulemaking pertaining to HCSMs.

By way of background, Solidarity's ministry is rooted in protecting the religious rights of our members by enabling members to share in one another's healthcare expenditures without having to fund services or items that violate their consciences. We also support our members in obtaining fair and equitable pricing for healthcare services so we can be good stewards of one another's resources. And we focus on conscience and cost issues by forming an authentic and vibrant community of members that, in addition to helping shoulder the healthcare cost burdens of fellow members, supports the spiritual needs of our members and their families.

Solidarity strongly supports the principles of increased transparency in HCSMs to better inform and protect members of ministries and prospective members. We are transparent about ministry operations and financials with our members, prospective members, and healthcare providers caring for our members. We have also been transparent with public officials, including in responding to requests from this very office. And we believe that policies that promote greater transparency of ministries without being overly burdensome or punitive warrant consideration.

While we see ourselves first and foremost as a ministry serving our community, we recognize that officials, particularly insurance regulators, have a reason to understand what sharing ministries are operating in their respective states and how these ministries are operating, particularly by ensuring ministries or entities claiming to be ministries are not operating in ways that confuse their products with health insurance offerings. It is the view of Solidarity that all legitimate HCSMs should be very

comfortable with and even desiring of greater transparency that balances the need to provide regulators with appropriate levels of information while not being overly burdensome to ministries or violating our free exercise of religion. Solidarity largely supports the pending rulemaking before the Department in Washington. Following are two specific requests for further modification and clarification.

- **Prompt reply period:** We recommend amending the timeframe from the proposed 15 business days to 20 business days. Taking this action will provide ministries with slightly more time to respond to an inquiry without elongating this period unnecessarily.
- **Accounting definitions:** We note that the proposal includes definitions for both a "certified public accounting firm" and "independent certified public accounting firm." We recommend that the proposed rule be amended to include a single definition rather than two definitions to prevent confusion on this topic.

Conclusion

In closing, Solidarity supports the proposal put forward and encourages consideration of the changes noted above. We believe the office has a responsibility to understand the sharing marketplace in the state and that the pending proposal is, aside from the requested amendments, structured in a manner that balances this need with protections for ministries and ministry members from undue burdens. We remain willing to continue engaging with the office going forward and encourage the office to recognize the important need sharing ministries are filling by providing consumers with quality and affordable means of paying for healthcare expenditures while protecting their consciences.

If you have any questions about this letter, please do not hesitate to contact me.

Sincerely,



Bradley L. Hahn, J.D.
Chief Executive Officer