



July 14, 2022

Ms. Shari Maier
Washington State Office of the Insurance Commissioner
P.O. Box 40258
Olympia, WA 98504
Submitted via e-mail to: rulescoordinator@oic.wa.gov

RE: R 2022-04 Statement requirement for consumer adverse benefit determination notices

Dear Ms. Maier,

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 statement requirement for consumer adverse benefit determination notices rules.

WAC 284-43-3070(2)(g) in the prepublication draft makes the new adverse benefit determination statement effective November 1, 2022. Both our internal systems and our vendor partners requires a long lead time to program changes to adverse benefit determination notifications. We are concerned there will not be adequate time between when the rules are adopted and the November 1st deadline. For that reason, we respectfully request 90 days from the effective date of the final rule to comply with the change in requirement.

Thank you for considering our comments. Please let me know if you would like to discuss any of our feedback further. I can be reached at 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