

Rules coordinator (policy)

Reference #	12979772
Status	Complete
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Rule number/topic	RE: HB 1688 Rule Making
Comment(s) or question(s)	<p>Thank you for this opportunity to provide comments on behalf of the UW Medicine health system regarding the OIC's rulemaking pursuant to HB 1688.</p> <p>UW Medicine supports the request of the Washington State Hospital Association (WSHA) to remove the words "hospital outpatient department" from the draft rule as it would unreasonably expand the scope of the rule's coverage beyond what is intended by HB 1688 (and the No Surprises Act) and would lead to unnecessary costs to hospitals and confusion for patients. If the rule language were revised to read, "(i) Is a provider-based facility under 42 C.F.R. Sec. 413.65; (ii) Charges a hospital facility fee in billing associated with the receipt of outpatient services from the entity or site", the rule would be more than sufficient to carry out the intent of the legislature.</p> <p>As detailed in comments provided to the OIC by the Washington State Hospital Association, many freestanding non-hospital outpatient departments (including those maintained by UW Medicine) utilize the same Federal Tax ID numbers as hospitals. As the proposed rule's use of hospital</p>

TINs would sweep these freestanding sites under its coverage, the rule would go beyond the scope of the bill as well as the No Surprises Act. As the cost and confusion that would be caused by the inclusion of hospital TINs is easily and effectively avoidable by modifying the language as detailed above, the modification is justified and endorsed by UW Medicine.

Your work on this issue is much appreciated. I am happy to discuss this comment in greater detail. Please feel free to contact me at any time.

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Last Update	2022-11-28 10:27:05
Start Time	2022-11-27 11:03:07
Finish Time	2022-11-28 10:27:05
IP	205.175.116.238
Browser	IE
Device	Desktop
Referrer	https://www.insurance.wa.gov/
