From:
 Jeb Shepard

 To:
 Rogalla, Sydney (OIC)

 Cc:
 Billie Dickinson

Subject: RE: CR-101 (R 2023-06) Health care benefit manager registration

**Date:** Thursday, August 17, 2023 1:22:14 PM

Attachments: image001.jpg image002.jpg

Thanks Sydney. Do you know when the public hearing will be?

Our main interest in this rulemaking is revisiting the issue of physician practices being asked by insurance carriers to register as PBMs for participating in value based contracts. Doesn't seem like that was the intent of the law intended to be focused on HCBMs. If you would please pass this on to the staff working on the rulemaking it would be greatly appreciated.

Jeb

From: Rogalla, Sydney (OIC) <Sydney.Rogalla@oic.wa.gov>

**Sent:** Friday, August 11, 2023 2:20 PM **To:** Jeb Shepard <jeb@wsma.org>

Subject: Fw: CR-101 (R 2023-06) Health care benefit manager registration

Hello Jeb,

We will not be sharing any language in advance of the August 18<sup>th</sup> deadline for comments on the CR-101. All comments made during this period will be valuable with the drafting of the proposed language. We look forward to your feedback.

Thanks, Sydney

## Sydney Y. Rogalla, MPH

Pronouns: she/her/hers Policy Analyst- Health Care Focus Policy and Legislative Affairs Division

Washington State Office of the Insurance Commissioner 360.725.7042 (phone) sydney.rogalla@oic.wa.gov

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**From:** OIC Rules Coordinator < Rules C@oic.wa.gov>

Sent: Wednesday, August 9, 2023 9:24 AM

To: Rogalla, Sydney (OIC) <<u>Sydney.Rogalla@oic.wa.gov</u>>

Subject: FW: CR-101 (R 2023-06) Health care benefit manager registration

From: Jeb Shepard < jeb@wsma.org>

**Sent:** Tuesday, August 8, 2023 10:49 AM **To:** OIC Rules Coordinator < RulesC@oic.wa.gov>

**Cc:** Billie Dickinson < billie@wsma.org>

Subject: FW: CR-101 (R 2023-06) Health care benefit manager registration

Hello,

Wondering if you are able to share any draft language in advance of the Aug 18 deadline to comment?

Jeb

From: WA OIC < insurance.wa@public.govdelivery.com>

**Sent:** Thursday, August 3, 2023 3:37 PM **To:** Jeb Shepard < <u>jeb@wsma.org</u>>

Subject: CR-101 (R 2023-06) Health care benefit manager registration

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## Notice of rulemaking on health care benefit manager registration (R 2023-06)

Thanks for your interest in rulemaking from the Washington State Office of the Insurance Commissioner.

The existing Health Care Benefit Manager (HCBM) registration process requires a significant amount of documentation that has been determined to be excessive and does not assist with the registration process. The proposed rule will streamline the registration process. It will also be updated to require HCBMs disclose federal violations.

Comments are due August 18, 2023; please send them to <a href="mailto:rulescoordinator@oic.wa.gov">rulescoordinator@oic.wa.gov</a>.

For more information, including the notice to start rulemaking (CR-101), <u>please visit the rule's webpage.</u>