

**From:** [Douthit, Jane](#)  
**To:** [OIC Rules Coordinator](#)  
**Subject:** Consolidated Health Care Rulemaking Prepublication Draft (R 2023-07)  
**Date:** Friday, September 1, 2023 7:30:59 AM

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External Email

Good morning,

On behalf of Cambia Health Solutions family of insurance companies (“Cambia”), including Regence BlueShield, Regence BlueCross BlueShield of Oregon, Regence BlueShield of Idaho, Asuris Northwest Health, and BridgeSpan Health Company, thank you for the opportunity to provide feedback on the prepublication draft for the consolidated health care rulemaking. We previously submitted comments on the CR-101 for this rulemaking and will not repeat them in this public comment period, however, we respectfully request you consider them for further drafts of the rule language. We understand that our comments will be addressed through the concise explanatory statement accompanying the final rules later this year, however, we would appreciate guidance on these concerns now as we implement the requirements from the underlying legislation for plan year 2024. If they cannot be addressed through rulemaking, we would appreciate guidance from your office directly.

Additionally, we would like to express support for the Association of Washington Health Plan’s (AWHP) letter on the prepublication draft.

Thank you,

Jane Douthit

Sr. Public & Regulatory Affairs Specialist

Cambia Health Solutions

(206) 332-5212

[Jane.Douthit@regence.com](mailto:Jane.Douthit@regence.com)

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