

August 31, 2023

Washington State Office of the Insurance Commissioner  
P.O. Box 40258  
Olympia, WA 98504-0260  
Submitted via email to: [rulescoordinator@oic.wa.gov](mailto:rulescoordinator@oic.wa.gov)

Re: Comments on R 2023-07 consolidated health care rulemaking prepublication draft

To Whom It May Concern,

Kaiser Foundation Health Plan of the Northwest, Kaiser Foundation Health Plan of Washington, and Kaiser Foundation Health Plan of Washington Options, Inc. (collectively “Kaiser Permanente”), appreciate the opportunity to provide feedback to the Office of the Insurance Commissioner (“OIC”) on the consolidated health care rulemaking prepublication draft (R 2023-07). Kaiser Permanente is an integrated health care system that covers and cares for Washingtonians. We are committed to delivering affordable, coordinated, and high-quality care and coverage that supports not only our members but also the communities we serve.

Thank you for preparing and sharing the prepublication draft regulation covering the topics of hearing instruments, cost-sharing for abortions, and cost-sharing for diagnostic and supplemental breast examinations. We support the comments and language recommendations submitted by the Association of Washington Healthcare Plans. Because the underlying laws are silent regarding in- and out-of-network coverage, we support the recommendation to allow health carriers to apply the same network structure used for the other services covered by the health plan. We also support the concept of providing clarification on which ancillary services must be covered without cost-sharing or if carriers may apply utilization management criteria.

Incorporating these clarifications into the final regulation will help ensure that Washington consumers have a consistent experience in accessing these health plan benefits, regardless of which health carrier provides their medical coverage.

We look forward to our continued collaboration throughout this rulemaking process. Please do not hesitate to contact us with questions.

Sincerely,



**Merlene Converse**

Senior Regulatory Consultant

**Kaiser Foundation Health Plan of the Northwest**

Government Relations

500 NE Multnomah Street, Suite 100  
Portland, OR 97232

503-936-3580 (cell)