

From: [Mandy Horton](#)
To: [OIC Rules Coordinator](#)
Subject: Prepublication Draft of R 2023-07
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External Email

Careington International Corporation holds several OIC licenses, including as a Health Care Benefit Manager (HCBM). We are writing to comment on the Prepublication Draft of R 2023-07. Specifically, we have the following comments on the changes to WAC 284-180-460 regarding HCBM filings:

1. Under existing OIC rules, carriers are already required to file their agreements with HCBMs. The rule and/or guidance issued to filers by OIC should allow HCBMs to identify a carrier filing by SERFF tracking number and adopt it as their own. Allowing HCBMs to file in this manner will eliminate duplication and inconsistency.
2. The current draft requires HCBMs to file contracts with carriers by September 21, 2023. Since the draft rules are not effective, and OIC has not issued guidance for how HCBMs should file their contracts with carriers, we would request that the filing deadline be extended until the rules and guidance are in place.

Thank you for your consideration. If you have any questions, please reach out to me.

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