



July 15, 2024

Andrew Davis
David Forte
Washington Office of the Insurance Commissioner
302 Sid Snyder Ave
Olympia, WA 98501
Submitted via email to: rulescoordinator@oic.wa.gov

Re: Insurer Holding Company Act CR-101 Comments (R 2024-04)

Dear Mr. Davis & Mr. Forte

On behalf of Cambia Health Solutions, Inc. family of insurance companies (“Cambia”), including Regence BlueShield, Regence BlueCross BlueShield of Oregon, Regence BlueShield of Idaho, Inc., Asuris Northwest Health, and BridgeSpan Health Company, thank you for the opportunity to provide feedback on the Insurer Company Holding Act CR-101.

We understand this rulemaking implements OIC request legislation (SB 6027) to align Washington’s Insurer Holding Company Act with the updated NAIC model authorities. There are a few areas surrounding the new law and NAIC models that we believe would benefit from clarity in the rulemaking or generally by the OIC. Below are our questions and comments for your consideration as you draft regulations:

- The rules should clarify who must file when the holding company is domiciled outside of Washington but there are sub-entities licensed and operating in Washington. The rules should be very clear and specific regarding who needs to file under these requirements.
- The rules should specify when filings must be submitted.
- How should amendments / corrections / updates be handled?
- Are there any cases where the OIC will allow exceptions to the NAIC group capital calculations (GCC) model? If there will be any special admitted practices that may allow a carrier’s filing to be different than others, the rules should spell-out those circumstances.
- The rules should confirm that the information in these filings will be confidential and not available to anyone outside the OIC.
- The rules should clarify that the information in the filing will not be used for rate decisions.

Thank you for considering our comments. Please let me know if you would like to discuss any of our feedback further. I can be reached at Jane.Douthit@Regence.com or (206) 332-5212.

Sincerely,

A handwritten signature in black ink that reads "Jane Douthit". The signature is written in a cursive style with a long horizontal flourish at the end.

Jane Douthit
Cambia Health Solutions
Sr. Public & Regulatory Affairs Specialist