

From: [Douthit, Jane](#)
To: [OIC Rules Coordinator](#)
Subject: Cambia Comments - HCBM 2nd prepublication draft (R 2024-02)
Date: Friday, September 13, 2024 1:02:31 PM

External Email

Good afternoon,

On behalf of Cambia Health Solutions, thank you for publishing a second prepublication draft of the Health Care Benefit Manager (HCBM) rules. We truly appreciate the opportunity to engage with you on these requirements.

We would like to thank the OIC for incorporating our suggestion regarding an alternative requirement to carriers filing all indirect HCBM contracts. We believe the solution you proposed in WAC 284-180-455(1)(b) is more realistic for carriers and still achieves the OIC's goal of transparency.

Cambia submitted previous comments on the CR-101 and first prepublication draft for these rules. We will not reiterate those previous comments at this stage but will note that the feedback from those previous letters is still relevant on the second prepublication draft. We would also like to express support for the Association of Washington Health Care Plans (AWHP) comments on the second prepublication draft.

Thank you,

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