



November 17, 2024

Jane Beyer
Office of the Insurance Commissioner
302 Sid Snyder Ave SW
Olympia, WA 98504

Submitted via email to rulescoordinator@oic.wa.gov

Dear Ms. Beyer,

On behalf of the Washington Chapter of the American Physical Therapy Association (APTA Washington), I am submitting comments in support of the Office of the Insurance Commissioner's (OIC) proposed rule relating to health care benefit managers (HCBMs) (WAC 284-180), specifically the rule that clarifies what is included in the annual gross income reporting by HCBMs (WAC 284-180-230).

Background

In 2020, the Legislature passed [SB 5601](#), legislation that requires HCBMs to register (and renew the registration annually) with the Office of the Insurance Commissioner (OIC) if they do business in Washington. APTA Washington joined other provider associations in supporting this important legislation. This registration requirement ensures that HCBMs are conducting business in a transparent manner and are accountable to the state for the decisions they make.

Insurers commonly use HCBMs to make critical decisions about a patient's access to their health insurance benefits. These companies are typically out-of-state and prior to 2020, were unregulated in Washington. Registration ensures there is accountability to the state, consumers, and providers for the actions of HCBMs. It also provides transparency regarding the relationship between the health benefit managers and the entities they contract with.

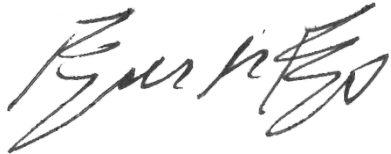
[APTA Washington supports OIC proposed WAC 284-180-230 \(Health care benefit manager renewal\)](#)

APTA Washington supports the proposed rule that clarifies the HCBM registration renewal requirements. Specifically, we support the clarification that annual gross income includes income received by the HCBM from *each contracted entity* that has made payments to the HCBM for services provided to covered patients in Washington state during the previous calendar year. This clarifies that gross income includes income from other carriers or another HCBM.

The original rule was silent on the specific types of income required in the annual gross income calculation. However, since 2020, HCBMs have increased who they contract with. In some cases, they contract with an insurance carrier, in other cases, it's with another HCBM. It's important that all HCBM gross income is disclosed to ensure a fully transparent record.

Thank you for the opportunity to provide comments in support of the HCBM proposed rule.

Sincerely,

A handwritten signature in black ink, appearing to read "Ben Boyle". The signature is fluid and cursive, with the first name "Ben" being more prominent than the last name "Boyle".

Ben Boyle, PT, DPT, FAAOMPT
President