

November 26, 2024

Rules Coordinator
Office of the Insurance Commissioner

Via email:

RE: R2024-02 – Relating to Health Care Benefit Managers Proposed Rule

To Whom It May Concern,

Premera Blue Cross and LifeWise Health Plan of Washington (collectively “Premera”) appreciate the opportunity to provide feedback on the Health Care Benefit Managers (R2024-02) Proposed Rule. Please find below comments and suggestions for your consideration. We look forward to continuing the discussion as we all work to make healthcare work better for Washingtonians.

WAC 284-180-130 - Definitions

The term ‘contract price’ is used but not defined. Premera strongly encourages the Office of Insurance Commissioner (OIC) to define the term “contract price” within WAC 284-180-130. There are multiple different rates in pharmacy pricing and having a common, explicit definition will ensure all parties have a clear understanding of the intent and compliance obligations. Premera would appreciate the opportunity to collaborate on the definition of ‘contract price’ to be included in the WAC.

WAC 284-180-460 – Health Care Benefit Manager Filings

Premera supports the simplification added in WAC 284-180-455 regarding carrier filing requirements. Premera strongly encourages the OIC to extend this same simplification/flexibility to health care benefit manager filings. Simplifying the process by reducing duplicative filings for both carriers and HCBMs will maintain consistency in meeting regulatory expectations.

Again, Premera appreciates the opportunity to offer comments on the proposed rule. Please let us know if you have any questions on the feedback provided above. We look forward to continued collaboration on this important topic.

Sincerely,



Megan M. Hartman
Manager, Regulatory & Compliance
Premera Blue Cross