



**National
Multiple Sclerosis
Society**

November 1, 2024

Washington State Office of the Insurance Commissioner
5000 Capitol Blvd. SE
Tumwater, WA 98501

RE: rulemaking consolidated health care (R 2024-05), WAC 284-170-130 definitions, telehealth established relationship

Rules coordinator,

On behalf of the National Multiple Sclerosis Society (Society), we are pleased to share our support for the Office of the Insurance Commissioner's (OIC) continued focus on the importance of telehealth access to all Washingtonians. The Society has been engaged in the process from the outset and we offer the following comments related to telehealth "established relationships".

Multiple sclerosis (MS) is an unpredictable disease of the central nervous system. Currently there is no cure. Symptoms vary from person to person and may include disabling fatigue, mobility challenges, cognitive changes, and vision issues. An estimated 1 million people live with MS in the United States. Early diagnosis and treatment are critical to minimizing disability. Significant progress is being made to achieve a world free of MS.

While the Society strongly recommends an initial meeting be in-person, it is important to note that there are access, transportation, geographical, time and distance considerations which make telehealth a necessary option for many. The Society advocates that individuals and providers have the flexibility to come to their own medical decisions based on what is in the best interest of the patient. The revisions to WAC 284-170-130 "Established relationship" align with these flexibilities while removing any differentiation between physical, behavioral, and other health care services.

The Society applauds the OIC's work in facilitating public participation, collecting feedback, and ensuring continued access to telehealth for all Washingtonians. Please contact Seth.Greiner@nmss.org with any questions.

Regards,

A handwritten signature in blue ink, appearing to read 'Seth M. Greiner', written over a light blue circular stamp.

Seth M. Greiner
Senior Manager, Advocacy