



July 1, 2020

Mandy Weeks-Green
Washington State Office of the Insurance Commissioner
P.O. Box 40260
Olympia, Washington 98504
Via email: rulescoordinator@oic.wa.gov

**Re: Health Care Benefit Managers Rule (R 2020-04); CR-101 Comments from
Coordinated Care Corporation, NAIC# 95831**

Dear Mandy,

Coordinated Care Corporation (“CCC”) appreciates the opportunity to comment on the Health Care Benefit Managers rule implementing Second Substitute Senate Bill 5601. CCC offers the following comments and suggestions:

Regarding Section 4, Subsection 2 of SSSB 5601:

This section specifically states that “A health care benefit manager must file with the commissioner, ... every benefit management contract and contract amendment between the health care benefit manager and a provider, pharmacy, pharmacy services administration organization or other health care benefit manager, entered into directly or indirectly in support of a contract with a carrier or employee benefits program, within thirty days following the effective date of the contract or contract amendment.” The term “benefit management contract” in this clause does not allude to the need to file every Participating Provider Agreement (PPA), as a PPA is just a contract between a contracted provider and the health care benefit manager and does not necessarily constitute a benefit management contract, for example like what a Pharmacy Benefit Manager would enter into with a carrier.

We request that the OIC specifically limit the scope of this rule to provider contract templates, as carriers already file templates for all providers in their network per WAC 284-170-480, regardless of whether the carrier directly contracts with the provider or accesses the provider through an intermediary agreement with a health care benefit manager.

Thank you for consideration of these comments. Please let me know if you have any questions. You may reach me directly at 206-701-1101.

Sincerely,

A handwritten signature in black ink, appearing to read 'J. Ben Beasley'. The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

J. Ben Beasley
Compliance Supervisor
Coordinated Care Corporation