

December 5, 2016

Jim Freeburg
P.O. Box 40260
Olympia, WA 98504

Sent via email to rulescoordinator@oic.wa.gov

Dear Mr. Freeburg:

I am writing on behalf of the Pharmaceutical Research and Manufacturers of America (PhRMA) regarding the proposed rule language on CR-102. The rule specifies a process that health plans must follow so consumers have a timely response to their request. Specifically, a plan must make its determination and notify the enrollee and their healthcare prescriber no later than seventy-two hours following receipt of the request. Additionally, the plan must have a process in case the patient or healthcare provider needs an expedited review due to exigent circumstances that may harm their health or ability to regain maximum function due to a disruption of that drug treatment. PhRMA supports this requirement because it protects the interests of the patient by providing a timely response and access to their medicine to avoid complications, potential hospitalizations and a disruption in their health status.

PhRMA is a voluntary, nonprofit organization representing the country's leading research-based pharmaceutical and biotechnology companies, which are devoted to inventing medicines that allow patients to lead longer, healthier, and more productive lives. PhRMA companies are leading the way in the search for cures.

The ability for patients, their designee, and healthcare provider to have the assurance that their request will be answered three days or less not only gives "peace of mind," it is a sound economic protection for the state as well. If the patient needs a medicine but experienced a disruption of therapy due to a delayed answer and subsequent permission to access the needed therapy, the state and the patient would incur unnecessary expenditures to deal with adverse consequences that could occur. This proposed rule provides one more protection to the patient that they deserve so that time can be spent more productively in adhering to the treatment plan and coordinating care.

We look forward to working with you and appreciate the efforts that the Office of the Insurance Commissioner has taken to further help patients.

Sincerely,



Sharon Brigner, Deputy Vice President, State Advocacy, PhRMA
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