



September 30, 2024

Ms. Joyce Brake
Washington Office of the Insurance Commissioner
302 Sid Snyder Ave
Olympia, WA 98501
Submitted via email to: rulescoordinator@oic.wa.gov

Re: Prior authorization modernization prepublication draft comments (R 2024-03)

Dear Ms. Brake,

On behalf of Cambia Health Solutions, Inc. and its affiliates, including Regence BlueShield, Regence BlueCross BlueShield of Oregon, Regence BlueShield of Idaho, Inc., Asuris Northwest Health, and BridgeSpan Health Company ("Cambia"), thank you for the opportunity to provide feedback on the prior authorization modernization rulemaking pre-publication draft.

We would like to thank the OIC for incorporating definitions of electronic and non-electronic prior authorization requests. Specifically, we support the movement of email to the definition of non-electronic prior authorization request and incorporating the existing electronic prior authorization regulatory language in the definition of electronic prior authorization request.

We also appreciate that the draft rules include updates to WAC 284-43-2020 to clarify scope and avoid any overlapping requirements with WAC 284-43-2050.

Our only concern with the draft rule language is regarding the health plan prior authorization review timeframes when additional information is needed from a provider or facility to process the request. RCW 48.43.830(1)(c) states that "in any instance in which a carrier has determined that a provider or facility has not provided sufficient information for making a determination under (a) and (b) of this subsection, a carrier may establish a specific reasonable time frame for submission of the additional information. This time frame must be communicated to the provider and enrollee with a carrier's request for additional information." We are concerned that the proposed language in WAC 284-43-2050(10)(b)&(c), which point to the timeframes in existing regulation, may conflict with this statutory requirement. We recommend subsections (10)(b) & (10)(c) be removed from the draft rules and simply keep the general reference to the prior authorization timeframes in RCW 48.43.830 in earlier part of subsection (10).

Thank you for considering our comments. Please let me know if you would like to discuss any of our feedback further. I can be reached at Jane.Douthit@Regence.com or (206) 332-5212.

Sincerely,

A handwritten signature in black ink, reading "Jane Douthit". The signature is fluid and cursive, with the first name "Jane" being more prominent and the last name "Douthit" written in a more compact, connected style.

Jane Douthit
Cambia Health Solutions
Sr. Public & Regulatory Affairs Specialist