

October 31, 2014

Jim Keogh, Rules Coordinator
Office of the Insurance Commissioner

Via email:

JimK@oic.wa.gov

Rules.Coordinator@oic.wa.gov

Dear Mr. Keogh:

On behalf of the Washington Association of Nurse Anesthetists (WANA), I am providing comments on Phase 2 of the Provider Network rules. WANA is an organization representing Certified Registered Nurse Anesthetists (CRNAs) across Washington. We appreciate the opportunity to comment on this rule draft.

While generally supportive of the changes in Phase 2, WANA has concerns that some of the language included in this draft is confusing when read with existing rules on "every category of provider." The Phase 2 language in WAC 284-43-300 states, "Provider networks must include every provider category and type necessary to deliver covered services." We believe this language is confusing when read with WAC 284-43-205, the every category of provider regulation. WAC 284-43-205 prohibits insurers from excluding any category of providers who provide health care services or care within the scope of their practice.

The Provider Network rule language could be interpreted as allowing insurers the ability to determine which providers or provider types are "necessary to deliver covered services" instead of following the requirements of WAC 284-43-205.

WANA requests that the language WAC 284-43-300 be amended to include the requirement that networks must also be consistent with the requirements of WAC 284-43-205.

Sincerely,

Christian Schmaltz, CRNA
President