

From: [Cathy Bolt Jones](#)
To: [OIC Rules Coordinator](#)
Subject: RE: CR-102 Draft
Date: Thursday, June 18, 2015 10:00:58 AM

I would like to comment on CR-102 Draft. I am very much in favor of the section •*Clarified that a provider or facility can reject a material amendment to a contract without affecting the terms of the existing contract. WAC 284-43-320 (6)(b).* While I am not sure what will qualify as a “material amendment” to a contract, I do believe the OIC is in receipt of recent concerns by the WSMA and WSMGMA regarding United Health Care’s recent addition of a requirement for records effective 7/1/15. We received this significant change via their newsletter back in April (effective July 1, 2015, care providers must submit to UnitedHealthcare all clinical data, including laboratory testing results, to support federal and state data collection and reporting requirements”).)

I’m not sure that the above communication/directive from UHC is what you are thinking about when you approach CR-102, but it should be. Medical Practices in WA state continue to be inundated with excessive administrative burden of health plans. And while I understand the plans may have constraints/obligations themselves as a result of federal and state requirements/bureaucracy, that is their burden not the burden of the practice. In other words if they agree to practice in our State, agree to the excessive Federal/state intrusion into their business then they must pick up the cost 100% to gather data/info that is necessary for them to operate their line of business in our State. A medical practice should be able to decline that obligation for non medical business without affecting their existing contract. Remember our role is to provide health care to the patient not do insurance administrative work.

Respectfully submitted,

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