



The Association of Washington Healthcare Plans

August 22, 2014

Transmitted electronically to [RulesCoordinator@oic.wa.gov](mailto:RulesCoordinator@oic.wa.gov)

Kate Reynolds, Special Assistant to the Commissioner  
Washington Office of the Insurance Commissioner  
P.O. Box 40258  
Olympia WA 98504

Re: R2014-08 CR-101 Network Access Preproposal Statement of Inquiry

Dear Ms. Reynolds,

I am writing on behalf of the members of the Association of Washington Healthcare Plans (AWHP) regarding the Washington Office of Insurance Commissioner's (OIC) Network Access Preproposal Statement of Inquiry. More detailed input and suggestions will be provided by our individual member healthcare plans.

The primary focus of this letter is the process to be used by the OIC for development of the Network Access requirements.

Network access is an area of great importance to our member organizations because of their commitment to providing consumers with high quality, affordable health care coverage choices. Accordingly, we believe it is in everyone's best interest for the network access rule-making process to be open, collaborative and transparent. It also should be conducted in a manner that allows adequate time for thoughtful consideration of stakeholder comments and recommendations, as well as responses back to those stakeholders.

In light of these goals, the initial phase of this two-part rule-making effort was less than optimal. We do however recognize that the OIC faced unique staffing and timing challenges during the development of the network adequacy regulations.

To help make this latest round of rule-making an improved process for all involved, we urge that the OIC form a collaborative stakeholder workgroup to review and evaluate the recently adopted network adequacy rules. This will allow for open constructive dialogue, and the insights and learnings gained from this interaction can then be applied to the development of best approaches for addressing regulatory needs, while minimizing administrative burdens.

We look forward to further discussion and collaboration on this matter. In the interim, please do not hesitate to contact me with any questions or if I may be of assistance.

Sincerely,



Sydney Smith Zvara  
Executive Director

Association of Washington Healthcare Plans  
7252 Fairway Ave SE, Snoqualmie, WA 98065  
Tel: 425-396-5375 Fax 425-396-5372 [www.AWHP-Online.com](http://www.AWHP-Online.com)

*AWHP is an alliance of licensed Health Maintenance Organizations (HMO), Health Care Service Contractors (HCSC), & Disability Insurers. Its diverse membership is comprised of local, regional, & national healthcare plans of varying size, serving the needs of consumers, employers, & public purchasers. Together, they provide health care coverage to over 4 million residents of Washington State. AWHP members include Aetna, Amerigroup, Cambia Health Solutions, CIGNA, Columbia United Providers, Community Health Plan of WA, Coordinated Care, Group Health Cooperative, Kaiser Permanente, Molina Healthcare, HealthNet, Premera Blue Cross, Providence Health Plan, & UnitedHealthcare.*