



August 22, 2014

Ms. Kate Reynolds  
Office of the Insurance Commissioner  
State of Washington  
P.O. Box 40258  
Olympia, WA 98504-0258

RE: (R 2014-08) Network access

Dear Ms. Reynolds,

On behalf of Cambia Health Solutions family of insurance companies, including Regence BlueShield, Asuris Northwest Health, and BridgeSpan Health Company, we appreciate the opportunity to provide the following comments to proposed rule 2014-08 relating to network access.

The following comments are based from the sections cut from the first network access exposure draft sent to carriers in December 2013.

**Access to providers**

We strongly oppose language that would require carriers to report if a facility or provider's office is open or closed to accepting new patients. The open or closed status of a facility or provider office changes frequently therefore ensuring that our list is up to date is a near impossibility. This would add to consumer frustration and confusion if wrong information was reported. Instead, we support providing consumers with contact information for facilities so that they can inquire if a facility or provider is open to new patients.

**Selection of participating providers**

We strongly oppose language that dictates reimbursement rates. If reimbursement rates are set by OIC this would limit a carrier's ability to enter into innovative reimbursement strategies by shifting negotiating leverage to providers at the detriment of the insured population. The triple aim of health care reform begs carriers to introduce innovative reimbursement methods. Dictating reimbursement rates undermines that goal.

**Provider contracts**

We strongly oppose language that sets out new requirements relating to prior authorization practices. Prior authorization issues should be addressed in a separate rulemaking.

**Participating providers**

We strongly support language that would allow carriers to create participating provider networks that are innovative and help achieve the triple aim of health care reform.

Again, we thank you for the opportunity to provide comment to this proposed rulemaking. We stand willing to work with your office to find reasonable solutions to the issues presented in this letter. Please don't hesitate to contact me with further questions.

Sincerely,

Zach Snyder

Zach Snyder  
Regulatory Affairs Specialist  
Cambia Health Solutions