

From: [Waltraut Lehmann](#)
To: [OIC Rules Coordinator](#)
Cc: [Freeburg, Jim \(OIC\)](#)
Subject: Preproposal R 2014-13 pharmacy benefits
Date: Wednesday, December 17, 2014 4:28:21 PM

Dear Rules Coordinator,

I am writing to you with a couple of brief comments on behalf of Premera Blue Cross as well as LifeWise Health Plan of Washington regarding the prior authorization of pharmacy benefits, in response to your office's preproposal R 2014-13.

Premera has been part of the workgroup discussions on this subject, and we support the direction established by that group for OIC rulemaking. As you move forward in considering the approach to this rule topic, we would especially urge your office to keep in mind the following two points, which we believe are significant in this context:

- New or revised processes should be closely examined to avoid unnecessary complexity or confusion for either providers or enrollees.
- And in light of the fact that a number of details for prior authorization processes will require system changes or other process changes, a significant amount of lead time will be needed to implement rules once they are finalized. This should not be done in haste.

We will be happy to make ourselves available for further discussion of the details, if that would be useful, and we look forward to providing additional comments and/ or participate in meetings as needed.

Please contact me if you have questions - thank you very much!

Waltraut

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