

**America's Health
Insurance Plans**

601 Pennsylvania Avenue, NW
South Building
Suite Five Hundred
Washington, DC 20004

202.778.3200
www.ahip.org



September 1, 2015

Bianca Stoner
Washington State Office of the Insurance Commissioner
PO Box 40258
Olympia, WA 98504-0258

Re: Health Plan Special Enrollment Rules (R 2015-10)

Dear Ms. Stoner:

I write today on behalf of America's Health Insurance Plans (AHIP) to provide comments on the Washington Office of the Insurance Commissioner's (OIC) preproposal on health plan special enrollment rules.

AHIP is the national trade association representing the health insurance industry. AHIP's members provide health and supplemental benefits to more than 200 million Americans through employer sponsored coverage, the individual insurance market, and public programs such as Medicare and Medicaid. Our members offer a broad range of health insurance products in the commercial marketplace and also have demonstrated a strong commitment to participation in public programs.

AHIP supports state efforts to align its regulations with requirements in the ACA and related federal guidance, when applicable. We recommend that, whenever possible, the state regulations refer back to and cite specific provisions of the federal rules, rather than re-stating or paraphrasing them. Adopting a re-statement or interpretation of the rules is not a prudent rulemaking practice because any future amendment to the federal rules will be lost unless the state goes back every time a change is made at the federal level to make the same amendments to its regulations. Simply citing the federal provisions, however, will streamline Washington's administrative process and ensure that its carriers are being held to the most current federal standards.

Due to the broad nature of the rulemaking description in the preproposal, we urge the OIC to provide stakeholders with an exposure draft of the proposed rules prior to filing. This will give carriers an opportunity to provide the OIC with specific operational concerns that the proposed rules may pose.

We appreciate the opportunity to provide comments and look forward to continued discussions with you on this important issue. If you have any questions, please do not hesitate to contact me at gcampbell@ahip.org (971-599-5379).

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Sincerely,

A handwritten signature in cursive script that reads "Grace Campbell". The signature is written in black ink and is positioned below the word "Sincerely,".

Grace Campbell
Regional Director