

From: Janet Varon [<mailto:janet@nohla.org>]
Sent: Thursday, August 20, 2015 2:57 PM
To: Middleton, Stacy (OIC)
Cc: Carla Lawrence; Siems, Jason (OIC); Johns-Brown, Lonnie (OIC)
Subject: RE: CR-101

It seems from the message from Barbara Lantz, that HCA believes that OIC has authority to request written records from IROs; I believe they are saying this based on RCW 48.43.535(10):

(10) Each certified independent review organization must maintain written records and make them available upon request to the commissioner.

OIC would then have rulemaking authority under subsection (12). Is your interpretation that certified IROs are not subject to these provisions when they are making decisions in Medicaid cases? If so, it would help to understand your analysis.

We think it would be useful to the public for all IRO decisions to be in the database, including ones in Medicaid cases, so we are hoping to find a way to accomplish this.

Thanks,

Janet

Janet Varon
206-325-6464
janet@nohla.org