



September 15, 2016

Mr. Jim Freeburg
Office of the Insurance Commissioner
State of Washington
P.O. Box 40258
Olympia, WA 98504

RE: R 2016-22 (Prescription drug substitution process)

Dear Ms. Freeburg,

On behalf of Cambia Health Solutions family of health plan carriers, including Regence BlueShield, Asuris Health Northwest, BridgeSpan Health Company, we appreciate the opportunity to comment on R 2016-22, relating to the prescription drug substitution process.

We appreciate that the timelines discussed in the stakeholder draft align with current Medicare timelines. This fact highlights OIC adherence to best practices in drafting the rule.

However, with that said, current Medicare rules state that the clock does not start until supporting statements are received. This is important to address to ensure that carrier have the information necessary to make a coverage decision.

I am happy to talk with your office about this rulemaking at any time. I can be reached at (206) 332-5060 or zach.snyder@cambiahealth.com.

Sincerely,

A handwritten signature in black ink, appearing to read "Zach Snyder", with a stylized, cursive-like flow.

Zach Snyder
Cambia Health Solutions
Regulatory Affairs