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June 24, 2016

Transmitted by electronic mail to: [Rulescoordinator@oic.wa.gov](mailto:Rulescoordinator@oic.wa.gov)

Jim Tompkins  
Rules Coordinator  
Washington Office of the Insurance Commissioner  
PO Box 40260  
Olympia, WA 9854-0260

Re: Insurance Commissioner Matter R 2016-12

Dear Mr. Tompkins:

This letter is written in support of CR101 preproposal of possible rulemaking to allow insurance companies to implement procedures for the processing and payment of claims to include other forms of payment, including but not limited to, electronic funds transfer or a prepaid card.

Aetna is one of the nation's leading diversified health care benefits companies. Aetna offers a broad range of traditional, voluntary and consumer directed health insurance products and related services including medical, pharmacy, dental, behavioral health, group life and disability plans.

Aetna supports and prefers payments by electronic fund transfer (EFT), sometime referred to as automated clearing house (ACH) transfers. This electronic payment methodology is safe and secure and more convenient to both the payer and payee. EFT transactions have a lower administrative cost and are a green alternative to the mailing and processing of thousands of paper checks.

In addition to EFT, Aetna supports other electronic payment options such as Virtual Credit Card (VCC). However, in the event the regulations require carriers to obtain written consent from providers as a pre-requisite for VCC payment methodology, we believe that the administrative cost of obtaining and storing written consent of the payee will make this form of payment less attractive due to higher administrative cost and greater inconvenience associated with maintenance of the written consent record. Providing prior written notice to a health care provider that VCC payment methodology will be implemented is the preferred alternative to obtaining written consent.

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Thank you for considering these comments. We look forward to reviewing the draft rule.

Sincerely,

A handwritten signature in black ink, appearing to read "Clifton Able". The signature is written in a cursive style with a large, stylized initial "C".

Clifton Able  
Sr. Market Compliance Consultant  
Aetna Life Insurance Company

cc. Norm Seabrooks, Vice President, Northwest Market Head  
Marcy Baker, Director Electronic Remittance and Payments