

From: [Douthit, Jane](#)
To: [OIC Rules Coordinator](#)
Subject: Cambia Comments - telemedicine second stakeholder draft (R 2021-06)
Date: Tuesday, August 31, 2021 1:50:58 PM

External Email

Hi Jane,

On behalf of Cambia Health Solutions family of insurance companies (“Cambia”), including Regence BlueShield, Asuris Northwest Health, BridgeSpan Health Company, Regence BlueCross BlueShield of Oregon, and Regence BlueShield of Idaho, thank you for the opportunity to provide comments on the second stakeholder draft for the telemedicine and audio-only telemedicine services rulemaking. We appreciate your consideration of our previous comments on this rulemaking and the progression of the draft based on stakeholder input.

We would like to reiterate our concerns with creating and enforcing new regulatory requirements for providers through carriers’ contracts. We understand the OIC does not have the authority to directly regulate providers but we remain concerned with this approach. However, we do appreciate the recognition that the language revisions, filings, and communication process regarding provider contract changes can be lengthy and strongly support the addition of WAC 284-43-433(10) which gives carriers until 7/1/2022 to bring provider contracts into compliance.

Please don’t hesitate to reach out if you have any additional questions for us or would like to discuss any of our comments.

Thank you,

Jane Douthit
Sr. Public & Regulatory Affairs Specialist
Cambia Health Solutions
(206) 332-5212
Jane.Douthit@regence.com

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