

## Cavalletto, Savanna (OIC)

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**From:** K Wilmering <seachange3@comcast.net>  
**Sent:** Thursday, August 12, 2021 11:55 AM  
**To:** OIC Rules Coordinator  
**Subject:** Comment on RCW 48.43.735

**Follow Up Flag:** Follow up  
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### External Email

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This email provides feedback on RCW 48.43.735.

I am delighted that this WAC will expand access to services for seniors and people with disabilities that preclude computer use. We have long needed legislation like this.

There are some concerns that I hope will be addressed.

First, I'd like you to clarify that in the situation below, the insurance company must still pay for the telemedicine visit. This proposed rule is especially problematic in rural areas where reception is frequently spotty. :

**(b) "Audio-only telemedicine" does not include real-time communication between a covered person and a provider that begins with the use of audio and visual technology but due to unanticipated circumstances must shift to audio-only technology in order to continue communication between the provider and covered person.** Why would insurance not reimburse for a session just because one mode went out and you found another that worked? It is prudent and good therapy to not break the human connection when internet goes out

Second is the requirement that we see them in person once yearly. With frail seniors, this will require a home visit, which currently is not reimbursable by most insurances. If this requirement is kept, there needs to be a rule that insurance needs to reimburse for it for twice the amount that they would pay for the same service otherwise. This accounts for the travel time that will usually require us to miss a billable hour or more.

Also, since some of us now provide services only remotely, we will not be able to meet this requirement.

Thank-you for your consideration.

Kathy Wilmering MSW ARNP BC

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