

Filed
12/17/14
KAC

STATE OF WASHINGTON
BEFORE THE WASHINGTON STATE
OFFICE OF THE INSURANCE COMMISSIONER

In the Matter of:

Seattle Children's Hospital Appeal of OIC's
Approvals of HBE Plan Filings.

Docket No. 13-0293

DECLARATION OF SUZANNE
VANDERWERFF IN OPPOSITION
TO INTERVENORS' JOINT MOTION
FOR SUMMARY JUDGMENT

I, Suzanne Vanderwerff, declare as follows:

1. I am the Senior Director of Revenue Cycle for Seattle Children's Hospital (SCH).

I make this declaration based on my personal knowledge and am competent to testify herein.

2. One of the SCH departments I supervise is the Insurance Processing Department.

During the month of January 2014, this department has had to process over 200 requests to Premera for approval of in-network coverage for care provided to patients insured by one of Premera's plans using the limited network developed for their plans sold on the Exchange. The administrative burden of processing this volume of requests has been significant, causing us to have to temporarily hire or reassign three FTEs dedicated to this work, and we may need to hire more. We have been told by Premera that Premera has also hired six or more additional FTEs in order to address the processing of these requests. The additional SCH FTEs has already resulted in additional costs to SCH, and the anticipated expense, including salaries and benefits for these three FTEs, for the year 2014 is estimated to be close to \$200,000. If the volume of Premera

DECLARATION OF SUZANNE VANDERWERFF RE:
INTERVENORS' JOINT
MOTION FOR PARTIAL SUMMARY JUDGMENT - 1
Docket No. 13-0293

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approval requests increases, resulting in the need to add more FTEs to this department to handle additional volume, the cost will be even higher.

3. The requests have involved both inpatient and outpatient care. Many of the requests have involved care that has already been provided. In many of these cases, SCH made the decision to provide care pending approval because the patient appointments had been scheduled for two months or more, and termination of the appointment in order to await approval would have resulted in medical risk to the patient, disruption of family plans and travel plans for the care, and disruption of SCH service schedules.

4. As of January 27, 2014, I am aware that Premera has approved 21 of these requests, and denied 8 of the requests. The remainder of the requests are still pending, resulting in delays to SCH in confirming whether appropriate reimbursement will be received for services provided.

I DECLARE, under penalty of perjury under the laws of the state of Washington, that the foregoing is true and correct.

Executed at Seattle, Washington this 28th day of January, 2014.


SUZANNE VANDERWERFF

DECLARATION OF SUZANNE VANDERWERFF RE:
INTERVENORS' JOINT
MOTION FOR PARTIAL SUMMARY JUDGMENT - 2
Docket No. 13-0293

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Filed
12-29-14
LAW

STATE OF WASHINGTON
BEFORE THE WASHINGTON STATE
OFFICE OF THE INSURANCE COMMISSIONER

In the Matter of:

Seattle Children's Hospital Appeal of OIC's
Approvals of HBE Plan Filings.

Docket No. 13-0293

DECLARATION OF KELLY
WALLACE IN OPPOSITION TO
INTERVENORS' JOINT MOTION
FOR SUMMARY JUDGMENT

I, Kelly Wallace, declare as follows:

1. I am a senior vice president and the Chief Financial Officer for Seattle Children's Hospital (SCH). I make this declaration based on my personal knowledge and am competent to testify herein.

2. Pediatric services at Harborview are limited to treatment for trauma (both ICU and other inpatient trauma care), burn, and EMTALA screening and stabilization; Harborview transfers to SCH pediatric patients with other conditions requiring inpatient treatment. Other than EMTALA screening and stabilization, and other very limited circumstances, pediatric services at UWMC are limited to NICU; UWMC transfers to SCH pediatric patients with other conditions requiring inpatient treatment.

DECLARATION OF KELLY WALLACE RE:
INTERVENORS' JOINT
MOTION FOR PARTIAL SUMMARY JUDGMENT - 1
Docket No. 13-0293

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I DECLARE, under penalty of perjury under the laws of the state of Washington, that the foregoing is true and correct.

Executed at Seattle, Washington this 27th day of January, 2014.

A handwritten signature in cursive script that reads "Kelly Wallace". The signature is written in black ink and is positioned above a horizontal line.

KELLY WALLACE

DECLARATION OF KELLY WALLACE RE;
INTERVENORS' JOINT
MOTION FOR PARTIAL SUMMARY JUDGMENT - 2
Docket No. 13-0293

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CERTIFICATE OF SERVICE

I certify that I served a true and correct copy of the foregoing on all parties or their counsel of record on the date below by hand delivery on [redacted]

Heather [redacted]
Horticultural [redacted]
[redacted]
Office of the [redacted] Commissioner
[redacted]
5100 Capital Boulevard
Tumwater, WA 98541

[redacted]
Charles [redacted]
[redacted]
Office of the Insurance [redacted]
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Michael J. Nelson
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Gerrilyn C. [redacted]
Lisa [redacted]
[redacted]
1420 [redacted]
Seattle, WA 98101

Bridgespan Health Company
[redacted]
[redacted], P.S.
[redacted]
[redacted] Suite 1600
Seattle, WA 98104-7010

I declare under penalty of perjury that the above is true and correct.

Executed at Seattle, Washington, this 29th day of January, 2014.

[redacted]
Legal Assistant

{076 [redacted] X; 1}
DUE TO [redacted] RE: [redacted]
MOTION FOR PARTIAL SUMMARY JUDGMENT - 3
Doc [redacted]

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