



Jon Hedegard
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Northwest Region

July 21, 2016

Bianca Stoner
c/o OIC Rules Coordinator (*submitted via email*)
Office of the Insurance Commissioner
PO 40258
Olympia, WA 98504-0258

Subject: R 2013-11, Health Care Information

Dear Ms. Stoner:

Allstate has not been part of the discussions on R 2013-11. It appeared from the subject matter, the citations, and the language used in the CR-101 that the focus was solely on health plans offered by health carriers. We understand that the OIC has been meeting with health carriers for around 3 years on this rule-making and that an accord may have been reached. We applaud all parties in their efforts to work out their differences.

Our issue is that the scope of the July 6, 2016, draft rule extends beyond just health plans offered by health carriers and applies to all licensees of the OIC. This would include P/C insurers, like Allstate, and also to our agents. We do not believe that this was the intent of the OIC. We believe our understanding was confirmed by your voice mail.

If the application of the proposed text is limited to just health plans offered by carriers, we do not have any concerns with the rule-making. Limiting the scope can be accomplished in a number of different ways. If the OIC would like us to utilize us as a resource in drafting limiting language, we would be happy to offer our time.

Thank you,

Jon Hedegard