

**From:** [Waltraut Lehmann](#)  
**To:** [Stoner, Bianca \(OIC\)](#); [OIC Rules Coordinator](#)  
**Subject:** Our comments: Stakeholder draft re issuer disclosures R 2013-11  
**Date:** Tuesday, August 09, 2016 2:56:04 PM

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Hello Bianca,

Thank you again for all the work you have done to move this topic forward in a constructive and practical fashion. With so many different issues and concerns, as you correctly pointed out, there comes a time when everyone is best served by wrapping up the initial step, and then considering whether any further steps are called for.

As we stated previously, we support the approach of providing easy-to-find and simple-to-follow information and instructions for individuals who have the need to protect their information from disclosure to other members of a household.

We suggest the following changes to the stakeholder draft, as stated at the meeting:

- The term “home page” should be replaced with a more generic term, such as website. This is because the home page of the entity may not be the right place for the information, for a variety of reasons, such as when the company operates in multiple states.
  
- The requirement to make policies available to members and non-members is too broad. Many of our policies are proprietary and are not typically made available; in addition, it is possible that numerous policies an issuer already has in place might require revision or amendment pursuant to the rule. Overall, it is likely that the number of policies could be quite voluminous. Therefore the provision as written is unnecessarily burdensome and will not necessarily result in helpful materials being provided to the requestor. We suggest you revise this requirement to, instead, mandate that an easily executed change of address form, and the necessary procedural instructions for the form, be readily accessible from the issuer’s website, while leaving in the provision requiring that the OIC be able to obtain and review the policies and procedures.

You had also asked about the way the process for an address change currently works at Premera. We would like to stress that we do understand the situations where an individual needs to redirect their health-care-related communications, and that making the process difficult to access is discouraging. We are also keenly aware of the need to ensure that an address change process not be readily subject to misuse, such as by someone who wishes to gain unauthorized access to an enrollee’s records.

As to our process – customers may do any of the following to easily change their address:

- Call into Customer Service
- Write to us
- Notify the post office (Once a month, Premera gets an upload with the addresses. This is from the National Change of Address Association.)
- Log onto the web portal and update their address, themselves

For call-in changes, the change is made right then, real-time and the member is informed accordingly. For web portal changes, I believe there is a confirmation or prompt that tells the member the change is made. No confirmation occurs if the change is made to us in writing or via the postal service.

If you have further questions, do please let me know, and thank you again for the opportunity to

comment. All the best,

*Waltraut*

*Waltraut B. Lehmann  
Manager, Regulatory Affairs  
Premera Blue Cross  
425-918-4974*