



September 4, 2015

Ms. Bianca Stoner  
Office of the Insurance Commissioner  
State of Washington  
P.O. Box 40258  
Olympia, WA 98504-0258

RE: R 2015-10 (Special Enrollment Periods)

Dear Ms. Stoner,

Thank you for the opportunity to comment on R 2015-10, relating to special enrollment periods.

We appreciate that your office indicated, in a document entitled “Overview of R-2015-10” posted to your website, that this proposed rulemaking is limited to aligning existing state special enrollment regulations with the updated federal regulations and does not purport to give OIC the authority to create new, state-specific special enrollment categories. The creation of state specific special enrollment categories may only be created by the legislature. However, we support your efforts to align state regulations with the new federal requirements.

Existing special enrollment period categories provide a valuable tool that allow consumers to enroll in health coverage outside of the annual open enrollment period. However, it is critical that special enrollment period categories are not created in a way that act as a disincentive to purchasing year round coverage. Creating exceptions and incentives that allow people to wait to enroll in coverage until they face a specific need undermines the ACA’s goal of universal, affordable coverage as allowing mid-year enrollment will make it more difficult for carriers to estimate their level of risk and set appropriate rates because the amount and distribution of enrollment under a new special event would be unknown.

We appreciate the OIC’s continued focus on maintaining a balance between a valuable open enrollment period and appropriate special enrollment periods.

Please let me know if you have any questions or comments.

Sincerely,

A handwritten signature in black ink, appearing to read 'Zach Snyder', with a stylized, cursive script.

Zach Snyder  
Cambia Health Solutions  
Regulatory Affairs