

Washington Office of Insurance Commissioner

August 7, 2023

RE: Comments responding to CR-101 for R 2023-02 (Revising the prior authorization process)

To whom it may concern:

This letter is in response to the request for comments for the CR-101 for R 2023-02, revising the prior authorization process. Premera Blue Cross (“Premera”) wanted to share some key considerations for the Office of Insurance Commissioner (“OIC”) as they undertake this important and impactful rulemaking.

First, Premera is hoping OIC can take this time to provide a clear distinction between non-electronic and electronic prior authorizations. Technical terms can cause additional confusion during implementation whenever definitions are assumed, especially if these terms are used to define the scope of obligations. While the electronic and non-electronic distinction seems common sense, Premera believes clearly defined terms can help facilitate implementation.

Second, and similar in some ways, Premera is hoping OIC can use this rulemaking opportunity to be exact in their expectations as to how to apply these requirements to participating and non-participating providers.

Finally, Premera always appreciates OIC’s use of templates and standardized language to provide plan-language explanations or examples for important communications. It is Premera’s hope that OIC can continue to leverage that expertise in the context of this rule to help illustrate a best-practice for any communications required by the proposed rulemaking.

While implementing new or complex regulations can be difficult, Premera looks forward to a continued partnership on these important issues.

Sincerely,



Samuel Wilcoxson  
Sr. Regulatory Compliance and Ethics Program Administrator