



August 22, 2025

Jennifer Kreitler  
Manager, Provider Network Oversight Program  
Washington Office of the Insurance Commissioner  
P.O. Box 40260  
Olympia, WA 98504-0260  
Submitted via email to: [rulescoordinator@oic.wa.gov](mailto:rulescoordinator@oic.wa.gov)

**Re: SSB 5579 Rulemaking**

Dear Ms. Kreitler,

On behalf of the Association of Washington Healthcare Plans (AWHP), we appreciate the opportunity to provide feedback on the implementation of SSB 5579. We support the Office of the Insurance Commissioner's (OIC) efforts to provide clear guidance to ensure compliance and consumer protection.

Carriers request clarification regarding the timing for finalizing the standard template language for provider contract termination notices. Specifically, we request that carriers be given 60 days between the date the template is finalized and the date on which carriers are expected to use it. This period is necessary to allow carriers to implement the template consistently across systems and coordinate with providers and facilities.

We also request that OIC review submitted notices within 30 days and refrain from providing itself any extensions due to the time-sensitive nature of contract terminations. If no action is taken within that period, we request that the submission be deemed automatically approved. We propose the following language be adopted for rulemaking purposes consistent with the first portion of WAC 284-170-480(3): "If the commissioner takes no action within thirty calendar days after submission, the form is deemed approved." This approach provides predictability and ensures carriers can meet statutory requirements without unnecessary delays.

AWHP and its member carriers are committed to complying with SSB 5579 while maintaining clear, accurate, and consumer-friendly communication. We look forward to working with OIC through the rulemaking process to ensure the implementation of this law is balanced, workable, and aligned with existing regulatory requirements.

Thank you for the opportunity to comment.

Sincerely,

Peggi Lewis Fu  
Executive Director