



**Washington
Association for
Community Health**
Community Health Centers
Advancing Quality Care for All

August 22, 2025

Rules Coordinator
Washington State Office of the Insurance Commissioner
302 Sid Snyder Ave, SW
Olympia, WA 98504

Re: WSR 25-15-143 Health Care Benefit Managers

Dear OIC Rules Coordinator,

The Washington Association for Community Health (“Association”) and its member community health centers (CHCs) appreciate this opportunity to comment on WSR 25-15-143, concerning health care benefit managers (HCBMs), and possible rulemaking for the implementation of E2SSB 5213. The Association represents our state’s network of 28 CHCs, which collectively provide comprehensive primary care, dental care, behavioral health care, and pharmacy services to over 1.27 million patients annually. Many CHCs in Washington State operate pharmacies to provide patients with affordable access to necessary prescription medications.

The Association and our member CHCs strongly agree that fair and transparent business practices of HCBMs and pharmacy benefit managers (PBMs) are vital to delivering high-quality care for our patients and communities. We appreciate the efforts made by OIC thus far to implement and enforce the provisions of E2SSB 5213. The amendments and additions to WAC 284-180 adopted in the previous rulemaking represent significant progress towards increasing oversight and accountability of PBMs.

However, CHCs continue to experience pressures on their pharmacy operations due to the lack of transparency of PBM practices. Strong enforcement is needed to ensure parity of reimbursement for WA pharmacies. When instances of non-compliance or other issues are identified, CHCs and other pharmacies must have access to clear and fair appeals processes to hold PBMs accountable. For many pharmacies, the administrative burden or fear of retaliation may be a barrier in filing appeals to seek recourse from PBMs. These types of discriminatory contracting and business practices by PBMs have prevented CHCs from providing the full range of safety net services that our patients rely upon.

The Association supports additional rulemaking to implement E2SSB 5213. We look forward to collaborating with OIC on the next phase of rulemaking to effectively implement the law. Additional oversight and regulation of HCBMs and PBMs will protect patient access to lifesaving medications. If you have questions, contact Alyssa Patrick, director of external affairs, apatrick@wacommunityhealth.org.

Sincerely,

Dave Pearson

A handwritten signature in black ink that reads "David Pearson". The signature is fluid and cursive, with the first name "David" being more prominent.

Chief Executive Officer

Washington Association for Community Health

