

ATTN: Rules Coordinator
Washington State Office of the Insurance Commissioner
P.O. Box 40258
Olympia, WA 98504

October 3, 2025

RE: R 2025-10 First Prepublication Draft

To whom it may concern:

This letter is in response to the first prepublication draft for R 2025-10 (Implementing SSB 5579) issued by the Office of Insurance Commissioner (OIC) on September 24, 2025. Premera Blue Cross (“Premera”) has long supported additional regulatory controls on provider termination notifications and we appreciate the opportunity to review and provide feedback on the prepublication draft.

WAC 284-170-421 – Provider Contract Standards

While Premera appreciates the specificity provided in section (4) regarding provider contract provision language, Premera encourages the OIC to simplify the language by allowing carriers to define the provider with whom they are contracting and themselves one time at the beginning of the contract provision, and subsequently allowing the use of terms “provider” and “plan” to refer to the specific entities to which the contract applies.

Additionally, Premera appreciates the flexibility included in section (c)(ii) that allows carriers to either utilize the standard template language or file a non-standard notice for the Commissioner’s approval. Premera encourages the OIC to further define the process and associated timeline for filing non-standard notices for approval. Specifically, Premera requests the OIC define: a timeframe in which non-standard notices must be filed by carriers before the contract termination and the expected timeline for OIC’s review and approval.

Premera also urges the OIC to adopt additional provisions related to the process for non-standard notices:

- non-standard notices submitted for review and approval shall be deemed approved if the OIC has not taken action to approve or reject the filing within a specified timeframe (e.g.: within 15 days of submission).

- non-standard letter templates filed and approved by the Commissioner may be used by the carrier for future provider terminations so long as only bracketed text is altered.

Premera believes that the above provisions will ease the burden of the new requirements while at the same time offering the consumer protections afforded by SSB 5579.

Premera has previously submitted comments on the proposed provider termination notification letter. Premera encourages the OIC to consider the submitted comments related to the template letter format and content to ensure clarity and consistency for all Washingtonians who will receive a provider termination notice for their carrier or provider.

Thank you for the opportunity to provide feedback on the prepublication draft. We appreciate the thoughtful consideration of Premera's suggestions. Premera looks forward to a continued partnership on this important issue.

Sincerely,

Megan M. Hartman

Megan M. Hartman
Manager, Regulatory and Compliance
Premera Blue Cross