

OIC Rules Coordinator

From: Jessica Knapick <jessica.knapick@gwmail.gwu.edu>
Sent: Friday, November 28, 2025 12:25 PM
To: OIC Rules Coordinator
Subject: R2025-10 CR-102 Comment

External Email

Hi Everyone,

Below I have a comment regarding the proposed rule:

This new proposal rule only considers a multiple of items. The first being the effective dates for small pharmacies which are classified as small businesses to submit their appeal process requesting reimbursement from Pharmacy Benefit Managers (PBM). In the report attached to this new proposed rule the National Association of Insurance Commission classifies pharmacies as having less than 38 people on staff which makes them a small business. This proposed extension is a great idea, because of all the changes that have been happening throughout this year. It gives smaller companies more time to get the reimbursement that they need to stay open from those PBM and Healthcare Benefit Managers (HCBM). During the government shutdown, these pharmacies could have experienced delays in getting reimbursed from Medicare patients by about 10 days according to the Centers for Medicare and Medicaid Services. This extended time in Washington State gives these businesses the opportunity to file the necessary claims needed to get the money they deserve back, while making sure they have time to fill out all the necessary paperwork.

In Washington State, HCBM's must be registered with the Office of Insurance Commissioner. This rule increases the registration fee from \$200 to \$500 and the renewal fee for licensure from \$500 to \$750. I agree that this increase in cost is a good thing. With health care getting more expensive it is important that oversight groups are also sufficiently funded to monitor everything. The monitoring of HCBM's is a newer process in this state, just starting in 2022 there is a lot to make sure everyone is set up for. An increase in cost to be registered with the state, is understandable considering it is going to continue to take more technology and personnel to monitor these businesses. I would argue that this fee should not be a standard fee, it should be a proportional fee for a company's income. Since these companies are now being monitored by the Office of the Insurance Commissioner this office would have information regarding how much the company made in profit each year. Since some HCBM's are large companies and some are small companies, the same rules cannot be simply applied to both.

The registration fee can stay at this stagnant price, but the renewal fee is what should be reconsidered. With the information reported to the IOC this would become a proportional renewal fee or \$750. Where the renewal fee should be 10% of the HCBM's income. If for some reason the 10% is less than \$750 the company would pay the \$750 instead. Overall, the IOC would be getting the money that is proposed but it could be more. Healthcare is a field that requires more transparency and that is something that most Americans and Washingtonians agree on. With more money being put into the oversight of it, this would open doors to helping people better understand what is going on in their health care system.

Another section of this rule requires that when a network pharmacy is requesting an appeal to the Commissioner's office, they are required to provide an email address. Previously they did not have to. This is a great provision because waiting for a return fax or sitting through a phone tree is something that is time

consuming and a waste of everyone's time. To cover all bases, this rule should include a provision stating this email needs to be checked every 72 business hours. Before that time ends some sort of acknowledgement needs to be sent by the network pharmacy stating they have received it. This way the emails make sure to get to who they need to and fast, and there is not a pile of outstanding paperwork "sitting" in the commissioner's office waiting to be filed.

Thank you,
Jessica Knapick
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