



Premera Blue Cross  
PO Box 327  
Seattle, WA 98111-0327

February 13, 2026

Rules Coordinator  
Office of the Insurance Commissioner  
P.O. Box 40255  
Olympia, WA 98504-0255

Via email

RE: R 2025-02 – Health carrier rate development components

To Whom It May Concern,

Premera Blue Cross and LifeWise Health Plan of Washington (collectively “Premera”) value our partnership with the Washington Office of the Insurance Commissioner (OIC) and appreciate the opportunity to provide feedback on the prepublication draft of R 2025-02 – Health carrier rate development components (the Preproposal).

Premera is concerned about the timing of the final cost-sharing reduction silver loading factor and plan-mapping assumptions used in the Commissioner’s calculation. The Preproposal states that the Commissioner will provide the silver loading factor and plan assumptions to issuers by March 31 of each year. Due to the turnaround required for filing, which is typically only one month later in May, Premera urges the OIC to move up the timing of this release to **February 28** of each year. Receiving the silver loading factor and plan assumptions by February 28 would provide carriers a more adequate lead time for issuers to prepare for filing in May.

Again, Premera appreciates the opportunity to review the Preproposal and provide feedback. Please let us know if you have any questions on the feedback provided above.

Sincerely,

A handwritten signature in black ink that reads "Megan M. Hartman".

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