

Direct practices in Washington state

Annual report to the Legislature Dec. 1, 2023

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Executive summary

The annual direct practice report to the Legislature highlights trends of participation and complaints within the direct practice primary care model. Direct practices are intended to provide extensions of coverage options and alternative medical homes. The Office of the Insurance Commissioner (OIC) has limited oversight of direct practices. Direct practices are sometimes called "retainer" or "concierge" practices, or direct patient-provider primary care practices.

Direct practices were authorized by the Washington state Legislature through a law enacted in 2007 Engrossed Second Substitute Senate Bill 5958, codified as <u>Chapter 48.150 in the Revised Code of Washington (RCW)</u>. No insurance plan is involved unless a patient has separate insurance coverage for medical services beyond the scope of those authorized by the direct practice law. A set monthly fee is charged for all primary care services, regardless of the number of visits or care provided. RCW 48.150.010(8) defines "primary care" as routine health care services, including screening, assessment, diagnosis and treatment for the purpose of promotion of health, and detection and management of disease or injury.

There are 81 direct practices registered in Washington state, a net increase of 25 in the last year. Out of all Washington state residents, 0.4% are enrolled with a direct practice, up from 0.31% in 2022. The OIC is required to annually report to the Legislature "participation trends, complaints received, voluntary data reported by the direct practices and any necessary modifications to this chapter."

The 2023 direct practices annual report analyzes the last three fiscal years of annual statements submitted to OIC by direct practices:

- **Fiscal year 2023:** July 1, 2022 through June 30, 2023
- **Fiscal year 2022:** July 1, 2021 through June 30, 2022
- Fiscal year 2021: July 1, 2020 through June 30, 2021

Participation trends in fiscal year 2023

- There were 31,669 (2022: 23,782) direct practice patients out of approximately 7.9 million Washington state residents, or 0.4% of the population.
- **Increase in overall patient participation:** Total participants increased by 7,887, or 33.2%, from 23,782 participants in fiscal year 2022 to 31,669 in fiscal year 2023.
- **Increase in the number of practices registered with the OIC:** Total registrations increased by 25, from 56 in 2022 to 81 in 2023. Twenty-five new direct practices reported to the OIC.
- **Change to direct practice fees:** From fiscal year 2022 to fiscal year 2023, of the 56 direct practices that operated across both years:
 - o Twelve direct practices reported they did not change their fees.

^{*} As reported by the WA Office of Financial Management. Exact population figure: 7,951,150 Direct practices in Washington state: Annual report to the Legislature | Dec. 1, 2023

- o Sixteen direct practices reported decreased fees.
- o Twenty-eight direct practices reported increased fees.
- o The twenty-five new direct practices have no fee history for prior years.
- **One complaint received:** The OIC received one complaint from August 2022 to July 2023 that an unregistered direct practice was unresponsive to attempts to bill and contact them.

OIC has limited oversight of direct practices. The agency registers the practices and collects the information to produce the annual legislative report. Much of the data collected is voluntary, beyond the registration and renewal requirements. If the Legislature is interested in more comprehensive data collection, the OIC needs additional authority.

Background

In 2007, the Washington state Legislature enacted a law to encourage innovative arrangements between patients and providers and to promote access to medical care for all citizens. Engrossed Second Substitute Senate Bill (E2SSB) 5958, also known as the direct patient-provider primary health care bill, is codified in RCW 48.150.

Prior to the passage of this law, direct care providers were subject to the state law for health care service contractors. However, due to the limited nature of the business model, the Legislature recognized that imposing the full scope of regulation was not practical for the limited number of direct care providers.

Under the 2007 law, registered direct practices operate within the safe harbor created by RCW 48.150 and are not insurers, health carriers, health care service contractors or health maintenance organizations as defined in RCW Title 48. As such, they operate without having to meet certain responsibilities required for insurers, including but not limited to financial solvency, capital maintenance, market conduct, and reserve and filing requirements. As a result, the OIC's regulatory authority over registered direct practices is extremely limited. The Legislature, instead, authorized the Department of Health and its various commissions to enforce violations of RCW 48.150 as unprofessional conduct (RCW 48.150.090). Any suspected violations of the law are reported to either the Department of Health, the Washington state Medical Commission, or both, for investigation and, where necessary, enforcement.

During the 2013 legislative session, the Legislature passed ESHB 1480, which amends RCW 48.150.040 to allow direct practices to dispense an initial supply of generic prescription drugs if the supply does not exceed 30 days. It also cannot involve an additional cost to the patient.

The OIC's regulatory role with direct practices is limited to the oversight of their registration and the review of their annual statements. The OIC reports this information annually to the Legislature. The Legislature did not give the OIC specific rulemaking authority over direct practices. However, the OIC has the authority to tell direct practice clinics how to submit annual statements, the format for submitting statements and what data to include.

Annual reports

Required direct practices annual statements include:

- The number of providers in each practice.
- The total number of patients served.
- The average direct practice fee.
- Names of direct practice providers.
- Business addresses.

The OIC's annual report to the Legislature must include:

- Participation trends.
- Complaints the OIC received.
- Voluntary data reported by direct practices.
- Any modifications to the chapter the OIC recommends as necessary.

Definition of direct practices in Washington state

Direct patient-provider primary care practices (direct practices) also are sometimes called "retainer" or "concierge" practices. Washington state defines direct practices in RCW 48.150.010 as a provider that:

- Charges a monthly fee for providing primary care services.
- Offers only primary care services.
- Enters into a written agreement with patients describing the services and fees.
- Does not bill insurance for any of the patient's primary care services.

A direct practice is a model of care in which physicians charge a predetermined, fixed monthly fee to patients for all primary care services provided in their offices, regardless of the number of visits or care provided. RCW 48.150.010(8) defines "primary care" as routine health care services, including screening, assessment, diagnosis, and treatment for the purpose of promotion of health, and detection and management of disease or injury.

Direct practices cannot sell to employer groups, however in 2009, the Legislature made minor modifications to the original legislation. Direct practices may now accept direct fees paid by an employer on behalf of an employee who is a patient. However, the law still prohibits employers from entering into coverage agreements with direct practices.

Physicians who provide direct care say they serve fewer patients than conventional practices but give patients more time during office visits to ask questions and receive explanations of medical care. Some direct practices offer additional services, such as same-day appointments, extended business hours, home visits and 24-hour emergency physician availability.

Direct practices do not provide comprehensive coverage. Under RCW 48.150.010(4)(d), direct practice services must not include hospitalization, major surgery, dialysis, high-level radiology, rehabilitation services, procedures requiring general anesthesia, more than an initial 30-day supply of prescription drugs or similar advanced procedures, services, or supplies. RCW 48.150.110(1) requires direct practice agreements to contain this disclaimer: "This agreement does not provide comprehensive health insurance coverage. It provides only the health care services specifically described."



2023 direct practice information

In October 2007, direct practices started filing annual statements with the OIC. Direct practices file a statement with the OIC to register and then annually submit a statement as a condition to continuing to offer direct practice services. Information for prior years is available in past reports[†] on the OIC's website.

Data from the annual statements

This report compares data from three fiscal years of annual statements:

- **Fiscal year 2023:** July 1, 2022 June 30, 2023
- **Fiscal year 2022:** July 1, 2021 June 30, 2022
- **Fiscal year 2021:** July 1, 2020 June 30, 2021

The following chart summarizes data that the OIC collected in fiscal year 2023:

[†] Link to past reports: https://www.insurance.wa.gov/legislative-and-commissioner-reports
OIC WA | 360-725-7009 | P.O. Box 40255 Olympia, WA 98504-0255

Table 1: Data summary

Direct Practice Name	County	# of patients FY 2020	# of patients FY 2021	# of patients FY 2022	# of patients FY 2023	Change in Enrollment	Monthly fee FY 2020	Monthly fee FY 2021	Monthly fee FY 2022	Monthly fee FY 2023	Change in Fees
Bjurstrom & Lee, PLLP	King	196	192	201	206	5	\$ 1,172.91	\$ 1,169.27	\$ 1,167.00	\$ 1,253.00	\$ 86.00
Emerald City Health	King	New report in 2022	New report in 2022	186	199	13	New report in 2022	New report in 2022	\$ 1,252.00	\$ 1,217.00	\$ (35.00)
Perkinson Finch, PLLC	King	242	247	255	242	-13	\$ 1,032.00	\$ 1,033.06	\$ 1,115.00	\$ 1,117.00	\$ 2.00
Dragonfly Medicine	San Juan	New report in 2023	New report in 2023	New report in 2023	271	New report in 2023	New report in 2023	New report in 2023	New report in 2023	\$ 300.00	New report in 2023
Bellevue Medical Partners PLLC	King	580	570	590	600	10	\$ 180.00	\$ 185.00	\$ 215.00	\$ 300.00	\$ 85.00
Jared M. Hendler, M.D. PLLC	Kitsap	88	84	82	85	3	\$ 235.00	\$ 243.42	\$ 266.19	\$ 284.64	\$ 18.45
James and Lacambra PLLC	King	650	936	782	912	130	\$ 235.00	\$ 229.00	\$ 255.00	\$ 275.00	20.00
Anchor Medical Clinic	Island	50 New	63 New	50 New	45	-5	\$ 200.00	\$ 200.00	\$ 200.00	\$ 275.00	\$ 75.00 New
Mdseelig	King	report in 2023	report in 2023	report in 2023	139	New report in 2023	New report in 2023	New report in 2023	New report in 2023	\$ 255.00	report in

Г	1	1		1	1	1	1		<u> </u>			
Sound Medicine And Wellness	King	100	150	195	205	10	\$ 200.00	\$ 200.00	\$ 230.00	\$	238.00	\$ 8.00
Weilife33	King	100	130	133	203	10	φ 200.00	\$ 200.00	\$ 250.00	Ψ	230.00	0.00
Seattle Medical												\$
Associates	King	3136	3430	3349	2948	-401	\$ 153.76	\$ 144.62	\$ 180.00	\$	225.00	45.00
		New	New	New								New
Bliss Health and		report	report	report in		New report	New report	New report	New report			report in
Wellness PLLC	Snohomish	in 2023	in 2023	2023	8	in 2023	in 2023	in 2023	in 2023	\$	195.00	2023
		New	New	New			= 0 = 0	= = =	5_5	_ -	155.55	New
Bridge Primary Care,		report	report	report in		New report	New report	New report	New report			report in
PLLC	Kitsap	in 2023	in 2023	2023	50	in 2023	in 2023	in 2023	in 2023	\$	186.00	2023
		New					New					
Docere Integrated		report					report in					
Medicine	King	in 2021	450	500	570	70	2021	\$ 179.00	\$ 159.00	\$	159.00	\$ -
	3							,				
Care Medical												\$
Associates, PLLC	King	292	287	276	268	-8	\$ 129.00	\$ 130.00	\$ 150.00	\$	151.00	1.00
		New	New	New								New
Joshua Hiep Le, DO		report	report	report in		New report	New report	New report	New report			report in
PLLC	King	in 2023	in 2023	2023	5	in 2023	in 2023	in 2023	in 2023	\$	150.00	2023
		New	New	New								New
		report	report	report in		New report	New report	New report	New report	_	4-0-00	report in
Wellness Direct Care	King	in 2023	in 2023	2023	70	in 2023	in 2023	in 2023	in 2023	\$	150.00	2023
		New					New					
		report		400	100		report in	. 100.00	4 4500	_	15000	\$
Nurture Well Center	King	in 2021	90	100	100	0	2021	\$ 100.00	\$ 145.00	\$	150.00	5.00
Wise Patient Internal	17.	712 or	744	604	770	450	t 100.00	¢ 425.00	¢ 425.00	<u>_</u>	4.42.00	\$ 7.00
Medicine, PLLC	King	363	744	621	779	158	\$ 100.00	\$ 125.00	\$ 135.00	\$	142.00	7.00
		New .					New					.
Camital Hill MA1: 1	Kin n	report	25	[F.4	26	10	report in	¢ 14100	f 110.00	4	141.00	\$
Capitol Hill Medical	King	in 2021	25	54	36	-18	2021	\$ 141.00	\$ 119.00	\$	141.00	22.00
Thurston leternal		New	New	New		Now garaget	Now see set	Nowers	Nowers			New
Thurston Internal	Thurston	report	report	report in	242	New report	New report	New report	New report	4	140.00	report in
Medicine, PLLC	Thurston	in 2023	in 2023	2023	342	in 2023	in 2023	in 2023	in 2023	\$	140.00	2023

Pier View	Kin n	220	105	210	40	171	¢ 210.00	¢ 206.00	¢ 120	.00	¢ 125.00	\$ (4.00)
Chiropractic, Inc PS	King	320	185	219	48	-171	\$ 219.00	\$ 206.00	\$ 139	.00	\$ 135.00	(4.00)
		New	New	New								New
River Valley Health		report	report	report in	4500	New report	New report	New report	New rep		¢ 420.00	report in
PLLC	Lewis	in 2023 New	in 2023 New	2023	4500	in 2023	in 2023 New	in 2023 New	in 20)23	\$ 120.00	2023
the row health		report	report				report in	report in				¢
collective	King	in 2022	in 2022	20	110	90	2022	2022	\$ 158	.00	\$ 120.00	(38.00)
Olympic Medical	9								7			\$
Services	Thurston	839	884	881	899	18	\$ 94.59	\$ 103.00	\$ 94	.00	\$ 115.00	21.00
		New	New				New	New				
		report	report				report in	report in				\$
Eventide Health PLLC	San Juan	in 2022	in 2022	562	600	38	2022	2022	\$ 108	.50	\$ 112.00	3.50
Edmonds Health												\$
Clinic	Snohomish	56	52	66	95	29	\$ 95.00	\$ 95.00	\$ 95	.00	\$ 103.00	8.00
		New	New	New								New
Functional Health		report	report	report in		New report	New report	New report	New rep			report in
Solutions	Snohomish	in 2023	in 2023	2023	270	in 2023	in 2023	in 2023	in 20)23	\$ 100.00	2023
		New	New	New report in		Now report	Now report	Now report	Now ron	ort		New report in
Lapis Medicine, PLLC	Pierce	report in 2023	report in 2023	report in 2023	3	New report in 2023	New report in 2023	New report in 2023	New rep in 20		\$ 100.00	2023
Lapis Medicine, 1 LLC	Ticicc					111 2023	111 2023	111 2023	111 20	723	Ψ 100.00	
		New .	New .	New					N.I.			New
Liberty Bell Family Medicine, PLLC	Okanagan	report in 2023	report in 2023	report in 2023	11	New report in 2023	New report in 2023	New report in 2023	New rep in 20		\$ 100.00	report in 2023
iviedicine, PLLC	Okanogan	111 2023	III 2023	2023	11	III 2023	111 2023	III 2023	111 20)23	\$ 100.00	2023
Family and Wellness												
Medicine LLC	King	18	21	17	20	3	\$ 100.00	\$ 100.00	\$ 100	.00	\$ 100.00	\$ -
		New					New					
Vigil Family Medicine	Diamas	report	12	90	145	65	report in	¢ 75.00	¢ 75	00	¢ 100.00	\$
PLLC	Pierce	in 2021 New	12 New	80	145	65	2021 New	\$ 75.00 New	\$ 75	.00	\$ 100.00	25.00
		report	report				report in	report in				¢
Focus Health DPC	Pierce	in 2022	in 2022	61	105	44	2022	2022	\$ 79	.00	\$ 99.00	20.00

		New .					New						*
NFB PLLC	King	report in 2021	267	476	522	46	report in 2021	\$ 78.00	\$	85.00	\$	98.00	\$ 13.00
	9	New	New	New				7	7		<u> </u>		New
Ivy Direct Primary		report	report	report in		New report	New report	New report		report			report in
Care	Clark	in 2023	in 2023	2023	0	in 2023	in 2023	in 2023	in	n 2023	\$	93.30	2023
Revitalize Metabolic		New	New	New		Now report	Now report	Now report	Now	ronort			New
Health PLLC	Pierce	report in 2023	report in 2023	report in 2023	53	New report in 2023	New report in 2023	New report in 2023		report n 2023	\$	90.00	report in 2023
Waters Edge Family	Tierce	111 2023	111 2023	2023	33	111 2023	111 2023	111 2023	11	1 2023	Ψ_	50.00	2023
Practice & Wellness													\$
center	Island	234	211	195	186	-9	\$ 87.50	\$ 115.20	\$ 1	110.00	\$	90.00	(20.00)
		New	New				New	New					
vancouver direct		report	report				report in	report in	_		_		_
primary care	Clark	in 2022	in 2022	20	92	72	2022	2022	\$	89.00	\$	89.00	\$ -
		New	New				New	New					
		report	report				report in	report in					\$
Novel Healthcare	Pierce	in 2022	in 2022	36	185	149	2022	2022	\$	94.00	\$	88.00	(6.00)
Destiny Direct Primary Care and		Now					New						
Wellness Center,		New report					report in						\$
PLLC	Pierce	in 2021	169	266	286	20	2021	\$ 72.00	\$	87.50	\$	87.00	(0.50)
. ==0		New	New	New				Ţ	7	07.00		07.100	New
Lupine Family		report	report	report in		New report	New report	New report	New	report			report in
Medicine	Chelan	in 2023	in 2023	2023	21	in 2023	in 2023	in 2023	in	1 2023	\$	85.00	2023
		New	New	New									New
Monarch Healthcare		report	report	report in		New report	New report	New report	New	report			report in
Solutions	Chelan	in 2023	in 2023	2023	292	in 2023	in 2023	in 2023	in	i 2023	\$	85.00	2023
		New					New						
Equinox Primary		report					report in						\$
Care PLLC	King	in 2021	425	410	395	-15	2021	\$ 75.00	\$	96.25	\$	85.00	(11.25)
Prudent Medical	5.	24		22	2.4		40.00	t 50.00	_	65.00	.	05.00	\$
Providers NW	Pierce	21	24	23	24	1	\$ 49.00	\$ 50.00	\$	65.00	\$	85.00	20.00
Ridgefield Family Medicine	Clark	0	0	16	9	-7	\$ 50.00	\$ 50.00	\$	60.00	\$	85.00	\$ 25.00

Pacific Northwest															
Wellness Center,															\$
PLLC	Douglas	1179	1556	1774	1250	-524	\$	55.00	\$	59.00	\$	63.00	\$	83.00	20.00
		New	New	New											New
		report	report	report in		New report	Nev	v report	Nev	v report	Nev	w report			report in
Thread Health, PLLC	Spokane	in 2023	in 2023	2023	155	in 2023		in 2023		in 2023		in 2023	\$	81.00	2023
Manette Clinic A	•														
Professional Service															\$
Corporation	Kitsap	876	922	899	908	9	\$	62.00	\$	86.00	\$	81.00	\$	80.00	(1.00)
Thrive Direct Health	·														\$
Care	Skagit	220	260	370	344	-26	\$	55.00	\$	60.00	\$	75.00	\$	80.00	5.00
transforMD Primary															\$
Care	Snohomish	43	58	39	29	-10	\$	70.00	\$	60.00	\$	70.00	\$	80.00	10.00
COHO MEDICAL															¢
GROUP PLLC	King	151	161	197	244	47	\$	79.00	\$	79.00	\$	80.00	\$	79.00	(1.00)
OKOOI I LLC	King	New	New	New	244	71	Ψ	7 3.00	Ψ	7 3.00	Ψ	00.00	Ψ	7 3.00	New
Essential Direct		report	report	report in		New report	Nev	v report	Nav	v report	Nev	w report			report in
Primary Care, PLLC	Thurston	in 2023	in 2023	2023	93	in 2023		in 2023		in 2023		in 2023	\$	78.00	2023
Assurance	marston	111 2023	111 2023	LOLS	33	111 2023		111 2025		111 2025		111 2025	Ψ	70.00	2025
Healthcare &															
Counseling Center,															
LLC	Yakima	1842	2045	2158	2362	204	\$	70.00	\$	75.00	\$	77.00	\$	77.00	\$ -
LLC	Takima	New	New	New	2302	201	Ψ	70.00	Ψ	7 3.00	Ψ	77.00	Ψ	77.00	New
Prompt Care Direct		report	report	report in		New report	Nev	v report	Nev	v report	Nev	w report			report in
LLC	Pierce	in 2023	in 2023	2023	3	in 2023		in 2023		in 2023		in 2023	\$	75.00	2023
LLC	Tierce	New	III EGES	LULS	3	111 2023		New		111 2023		III EOES	Ψ	73.00	2023
Main Street Family		report					r	eport in							
Medicine PLLC	Clark	in 2021	945	1057	1058	1		2021	\$	55.00	\$	75.00	\$	75.00	\$ -
Wedlettle 1 EEC	Clark	111 2021	343	1037	1030	•		2021	Ψ	33.00	Ψ	13.00	Ψ	7 3.00	Ψ
Quick Clinic	Lewis	1387	1486	1556	1590	34	\$	60.00	\$	60.00	\$	75.00	\$	75.00	\$ -
Direct Care Clinics															\$
US PC	Clark	500	430	350	350			60.00							7.00

		New report	New report	New report in		New report	Nov	/ report	Nov	v report	No	v report		ror	New port in
Koru Health PLLC	Clallam	in 2023	in 2023	2023	189	in 2023		in 2023		in 2023		in 2023	\$ 70.00	rep	2023
Sunny Family Medicine	Yakima	New report in 2023	New report in 2023	New report in 2023	100	New report in 2023		report in 2023		v report in 2023		v report in 2023	\$ 70.00	rep	New oort in 2023
GoodMed Direct Primary Care	King	328	322	332	331	-1	\$	59.00	\$	59.59	\$	60.00	\$ 70.00		\$ 10.00
Oodle Family medicine	King	130	140	180	230	50	\$	50.00	\$	60.00	\$	60.00	\$ 70.00		\$ 10.00
Everside Health	Pierce	2100	852	108	108	0	\$	60.00	\$	60.00	\$	69.00	\$ 69.00	\$	-
Dr Cranney Family Medicine	Spokane	New report in 2023	New report in 2023	New report in 2023	335	New report in 2023		report in 2023		v report in 2023		v report in 2023	\$ 65.00	rep	New port in 2023
Revive Innovative Healthcare PLLC	Thurston	New report in 2021	38	68	79	11	re	New eport in 2021	\$	70.00	\$	75.00	\$ 65.00	(\$ 10.00)
Cosmas Integrated Care Solutions	Thurston	New report in 2023	New report in 2023	New report in 2023	12	New report in 2023		report in 2023		v report in 2023	Nev	w report in 2023	\$ 60.00	rep	New port in 2023
Total Collision and Injury	Benton	20	14	11	10	-1	\$	60.00	\$	75.00	\$	75.00	\$ 60.00	(\$ 15.00)
DawnMDLLC	Whitman	New report in 2022	New report in 2022	270	310	40	re	New eport in 2022	re	New eport in 2022	\$	58.00	\$ 60.00	·	\$ 2.00
Vintage Direct															
Primary Care	Kitsap	1070	1036	1049	970	-79	\$	52.00	\$	56.00	\$	59.00	\$ 59.00	\$	-
ChymiymattymdLLC	Kitsap	160	145	124	140	16	\$	50.00	\$	50.00	\$	58.00	\$ 58.00	\$	-

Heritage Family														\$
Medicine	Thurston	29	29	29	10	-19	\$	70.00	\$	65.52	\$	65.34	\$ 57.50	(7.84)
Home Family		New report	New report	New report in		New report	Nev	v report	Nev	v report	Ne	w report		New report in
Medicine	Yakima	in 2023	in 2023	2023	293	in 2023		in 2023		in 2023		in 2023	\$ 56.00	2023
Swedish Community Health Medical														
Home	King	35	35	45	41	-4	\$	55.00	\$	55.00	\$	55.00	\$ 55.00	\$ -
D: . D: . C		New report	504	040	007	170	r	New eport in	.	55.00	<u></u>	55.00	 55.00	.
Direct Primary Care	Spokane	in 2021	594	818	997	179		2021	\$	55.00	\$	55.00	\$ 55.00	\$ -
Lissa Lubinski MD PLLC	Clallam	222	250	303	273	-30	\$	60.00	\$	75.00	\$	53.00	\$ 55.00	\$ 2.00
CompassDirect Healthcare	Kittitas	1192	1109	1368	1790	422	\$	50.00	\$	57.00	\$	57.00	\$ 54.00	(3.00)
North Star Clinic LLC	Jefferson	New report in 2023	New report in 2023	New report in 2023	34	New report in 2023		v report in 2023	Nev	v report in 2023	Nev	w report in 2023	\$ 52.50	New report in 2023
Urgent Medical Center	Clark	4	12	4	5	1	\$	60.00	\$	60.00	\$	50.00	\$ 50.00	\$ -
Snoqualmie Valley Hospital	King	119	74	41	0	-41	\$	40.00	\$	40.00	\$	40.00	\$ 30.00	\$ (10.00)
PWYC Healthcare	Thurston	New report in 2023	New report in 2023	New report in 2023	3	New report in 2023		v report in 2023	Nev	v report in 2023	Nev	w report in 2023	\$ 25.00	New report in 2023
MB2K, LLC	King	2	2	2	0	-2	\$	60.00	\$	60.00	\$	120.00	\$ _	\$ (120.00)
Family Care Spokane	Spokane	100	67	41	0	-41	\$	108.31	\$	75.00	\$	75.00	\$ -	\$ (75.00)



Locations

In 2023, 56 direct practices operating in Washington state submitted an annual statement.

Of those 56 practices, 25 reported to the OIC for the first time:

1.	Bliss Health and	d Wellness PLLC

- 2. Bridge Primary Care PLLC
- 3. Cosmas Integrated Care Solutions
- 4. Dr Cranney Family Medicine
- 5. Dragonfly Medicine
- 6. Essential Direct Primary Cary PLLC
- 7. Function Health Solutions
- 8. Home Family Medicine
- 9. Ivy Direct Primary Care
- 10. Joshua Hiep Le, DO PLLC
- 11. Koru Health PLLC
- 12. Lapis Medicine PLLC
- 13. Liberty Bell Family Medicine PLLC

- 14. Lupine Family Medicine
- 15. MDseelig
- 16. Monarch Healthcare Solutions
- 17. North Star Clinic LLC
- 18. Prompt Care Direct LLC
- 19. PWYC Healthcare
- 20. Revitalize Metabolic Health PLLC
- 21. River Valley Health PLLC
- 22. Sunny Family Medicine
- 23. Thread PLLC
- 24. Thurston Internal Medicine PLLC
- 25. Wellness Direct Care

Direct practices operate in 20 Washington state counties.

County	Direct practice – City
Benton	Total Care Clinics – Kennewick
Chelan	Lupine Family Medicine – Wenatchee
	Monarch Healthcare Solutions - Wenatchee
Clallam	Koru Health PLLC – Port Angeles
	Lissa Lubinski MD – Port Angeles
Clark	Direct Care Clinics US PC – Vancouver
	Main Street Family Medicine PLLC – Vancouver
	Ridgefield Family Medicine – Ridgefield
	Urgent Medical Center – Vancouver
	Vancouver Direct Primary Care – Vancouver

County	Direct practice – City
	Ivy Direct Primary Care - Vancouver
Douglas	 Pacific Northwest Wellness Center, PLLC (formerly RediMedi Clinic) – Wenatchee
Island	Anchor Medical Clinic – Freeland
	Water's Edge Family Practice and Wellness Center – Langley
Jefferson	North Star Clinic LLC – Port Townsend
King	Bellevue Medical Partners – Bellevue
	Bjurstrom & Lee, PLLP/MD2 – Bellevue
	Capitol Hill Medical – Seattle
	Care Medical Associates – Bellevue
	Coho Medical Group – Bellevue
	Docere Integrated Medicine – Auburn
	Emerald City Health PLLC/ MD ² Seattle II - Seattle
	Equinox Primary Care PLLC – Seattle
	Family and Wellness Medicine – Federal Way
	GoodMed Direct Primary Care – Seattle
	James and Lacambra PLLC/Seattle Premier Health – Seattle
	Joshua Hiep Le, DO PLLC - Renton
	MB2K, LLC/Family Care of Kent – Kent
	MDseelig - Seattle
	NFB LLC/Greenlake Primary Care – Seattle
	Nurture Well Center – Shoreline
	Oodle Family Medicine – Renton
	 Perkinson Finch, PLLC/MD² Seattle – Seattle
	Pier View Chiropractic – Normandy Park
	Seattle Medical Associates – Seattle
	Snoqualmie Valley Hospital – Snoqualmie
	Sound Medicine and Wellness – Seattle
	Swedish Ballard Family Medicine Clinic – Ballard
	The Row Health Collective – Snoqualmie
	Wellness Direct Care - Issaquah
	Wise Patient Internal Medicine – Seattle

County	Direct practice – City
Kitsap	Bridge Primary Care, PLLC – Bainbridge Island
	Chymiymattymd LLC/Pacifica Medicine and Wellness – Poulsbo
	Jared Hendler, MD – Bainbridge Island
	The Manette Clinic – Bremerton
	Vintage Direct Primary Care – Poulsbo
Kittitas	CompassDirect HealthCare/Ellensburg Family Medicine – Ellensburg
Lewis	Quick Clinic – Centralia
	River Valley Health PLLC – Mossyrock
Okanogan	Liberty Bell Family Medicine, PLLC - Twisp
Pierce	Destiny Direct Primary Care and Wellness Center, PLLC - Tacoma
	 Everside Health – Federal Way, Puyallup and Tacoma
	Focus Health DPC – Tacoma
	Lapis Medicine PLLC - Tacoma
	Novel Healthcare DPC – Gig Harbor
	 Prudent Medical Providers NW (formerly Sound Clinical Medicine, P.S.) – Gig Harbor
	Revitalize Metabolic Health PLLC – Gig Harbor
	Vigil Family Medicine, PLLC – Tacoma
	Prompt Care Direct LLC
San Juan	Dragonfly Medicine - Eastsound
	Eventide Health PLLC – Friday Harbor
Skagit	Fern Lane Company/Thrive Direct Health Care – La Conner
Snohomish	Bliss Health and Wellness PLLC - Lynnwood
	Edmonds Health Clinic – Edmonds
	Functional Health Solutions - Snohomish
	TransforMD Primary Care – Lynnwood
Spokane	Direct Primary Care – Spokane
	Dr Cranney Family Medicine - Spokane
	Family Care of Spokane – Spokane
	Thread Health PLLC - Spokane
Thurston	Cosmas Integrated Care Solutions - Lacey

County	Direct practice – City
	Essential Direct Primary Care PLLC - Olympia
	Heritage Family Medicine – Olympia
	Olympic Medical Services – Olympia
	PWYC Healthcare - Olympia
	Revive Innovative Healthcare PLLC – Yelm
	Thurston Internal Medicine PLLC - Olympia
Whitman	Dawn MD LLC - Pullman
Yakima	Assurance Healthcare & Counseling Center – Yakima
	Home Family Medicine – Yakima
	Sunny Family Medicine - Yakima

Participation in fiscal year 2023

- For direct practices that enrolled patients in both 2022 and 2023, enrollment **increased** at 32 direct practice clinics, for a combined total of 1,988 new patients. Including the direct practices that reported for the first time in 2023, 57 direct practices increased enrollment, with a total of 9,240 patients. For direct practices that enrolled patients in both 2022 and 2023, increases in new enrollees ranged from one at Family Medicine PLLC, Urgent Medical Center and Prudent Medical Providers NW to 422 at CompassDirect Healthcare.
 - Enrollment increased by 33% from 23,782 total enrollees in fiscal year 2022 to 31,669 enrollees in fiscal year 2023.
 - o Two clinics experienced an enrollment increase of over 200 patients from 2022 to 2023:
 - Assurance Healthcare & Counseling Center, LLC had an increase of 204 patients from 2022 to 2023, from 2,158 to 2,362, a 9.5% increase.
 - CompassDirect Healthcare had an increase of 422 patients from 2021 to 2022, from 1368 to 1790, a 31% increase.
 - Among the direct practices that reported for the first time in 2023, seven indicated enrollments of over 200 patients:
 - River Valley Health PLLC reported 4,500 enrollees.
 - Thurston Internal Medicine PLLC reported 342 enrollees.
 - Dr Cranney Family Medicine reported 335 enrollees.
 - Home Family Medicine reported 293 enrollees.
 - Monarch Healthcare Solutions reported 292 enrollees.
 - Dragonfly Medicine reported 271 enrollees.
 - Functional Health Solutions reported 270 enrollees.

- For direct practices that enrolled patients in both 2022 and 2023, enrollment **decreased** at 21 direct practice clinics, with a combined decrease of 1,425 enrollees.
 - o Northwest Wellness Center PLLC reported a decrease of 525 direct practice enrollees.
- Three direct practices reported no change in enrollment from 2022 to 2023.
- Twenty-one direct practice providers reported they participated as in-network providers in a health carrier's network in 2022. This is a significant change since reporting began in 2007 when all reporting practices performed direct-patient provider primary care exclusively. In 2021, 17 direct practices reported that they participated as in-network providers in a health carrier's network.
- All 81 practices reported the percentage of their business that is direct practice.
 - o Thirteen practices reported that 5% or less of their business is direct practice.
 - o Forty-nine direct practices reported that 100% of their business is direct practice.

The number of direct practice patients in WA has increased each year since 2019.

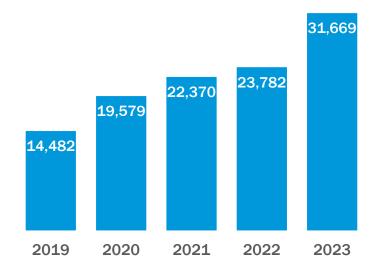


Figure 1: The total number of direct practice patients in WA by year, from 2019 to 2023. The total number of patients has increased each year.

The number of direct practices by their change in enrollment from 2022 to 2023.

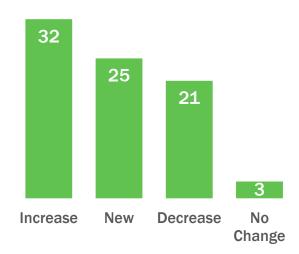


Figure 2: The number of direct practices grouped by their change in enrollment from 2022 to 2023. 32 out of 81 direct practices saw an increase in enrollment. 25 direct practices were reported as new.

The number of clinics by what percentage of their business is direct practice in 2023.

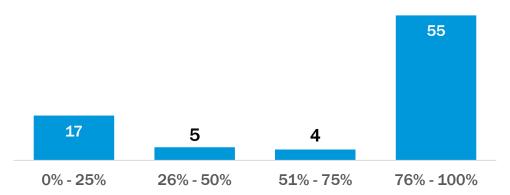


Figure 3: The number of clinics grouped by what percentage of their business is direct practice, for the year 2023. 55 out of 81 practices indicated that between 76% and 100% of their business is direct practice.

Fees in fiscal year 2023

- Twenty-eight direct practices increased their monthly fees.
 - Seventeen practices increased their fees by \$10 or more per month.
 - The average increase of monthly fees from 2022 to 2023 was \$20.57, compared to an increase of \$18.94 the previous year.
 - o Bjurstrom & Lee PLLP had the highest monthly fee increase of \$86.
- Fourteen direct practices decreased their monthly fees.
 - The average decrease of monthly fees from 2022 to 2023 was \$11.61, compared to an average decrease of \$16.27 the previous year.
- Twelve direct practices saw no change in their monthly fees from 2022 to 2023.
 - Among these clinics, the average monthly fee for patients was \$76.75.
- Two direct practices reported to the OIC but indicated they had zero enrollees, and as a result reported no monthly fees.
- The average monthly fee was \$150.28 (excluding the two practices that had zero enrollees and zero monthly fees), down from \$158.42 in 2022.
 - The average monthly fee for all new direct practices is \$111.27.
- The highest monthly fee is \$1,253 at Bjurstrom & Lee PLLP.
- The lowest monthly fee is \$25 at PWYC Healthcare, followed by Snoqualmie Valley Hospital (Public Hospital District No. 4 King County) with a monthly fee of \$30.

The number of direct practices by their change in monthly fees from 2022 to 2023.

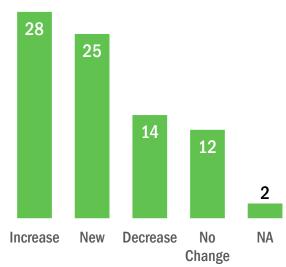


Figure 5: most direct practices (28 out of 81) saw an increase in their monthly fees from 2022 to 2023.

The distribution of direct practices by their monthly fees in 2023.

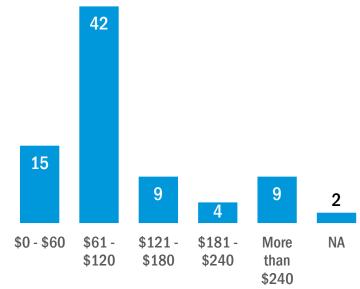


Figure 4: The number of direct practices grouped by their average monthly fees. More than half (42 of 81) direct practices indicated that their monthly fees are between \$61 and \$120.

The average monthly fees for WA direct practices by county.

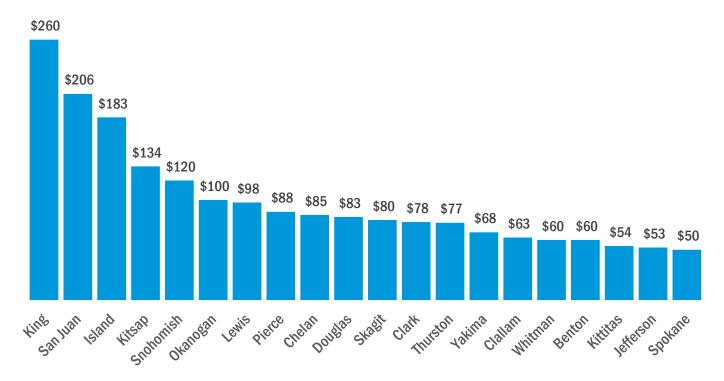


Figure 6: The average monthly fees for each county with reporting direct practices for the year 2023. King county had the highest average monthly fee of \$260, and Spokane county had the lowest, with an average monthly fee of \$50.

Affordability of direct practices

A key assumption underlying the 2007 legislation was that direct practices could provide affordable access to primary care services. In theory, this would reduce pressure on the health care system and relieve problems caused by a shortage of primary care physicians.

Monthly fees at direct practices vary from \$25 to \$1,253. Enrollees at 11 practices pay between \$100 and \$200 per month, though enrollees at 37 direct practices pay \$100 or less and enrollees at eight direct practices pay \$200 or more per month. The OIC does not collect data regarding the affordability of the fees for direct practice patients.

Table 2 below provides information about the enrollment in five fee ranges.

Table 2: Changes in practice average monthly fees over time

Monthly fee	\$ 50 or less	\$ 50 or less \$51 - \$75 \$76 - \$100		\$101 - \$200	\$201 +
FY 2023 enrollees	8	9,253	8,076	8,480	5,852
FY 2023 practices	5	23	26	16	11
FY 2022 enrollees	45	10,011	5,487	5,948	2,291
FY 2022 practices	2	23	12	12	7
FY 2021 enrollees	1,095	11,136	1,576	6,919	1,644
FY 2021 practices	5	24	7	11	5
FY 2020 enrollees	1,622	9,357	1,909	4,353	1,838
FY 2020 practices	6	15	9	7	5
FY 2019 enrollees	2,917	2,600	2,816	4,969	1,160
FY 2019 practices	4	10	7	8	5
FY 2018 enrollees	4,574	6,668	1347	4,585	532
FY 2018 practices	4	17	7	5	3
FY 2017 enrollees	2,556	5,336	1,348	4,554	996
FY 2017 practices	6	18	7	5	3
FY 2016 enrollees	1511	2581	2167	4151	862
FY 2016 practices	8	8	6	6	2
FY 2015 enrollees	1519	2651	2737	3757	840
FY 2015 practices	10	10	6	6	3

Monthly fee trends for direct practice enrollees.

In 2023, 45.3% of enrollees were in practices that charged more than \$100 in monthly fees.

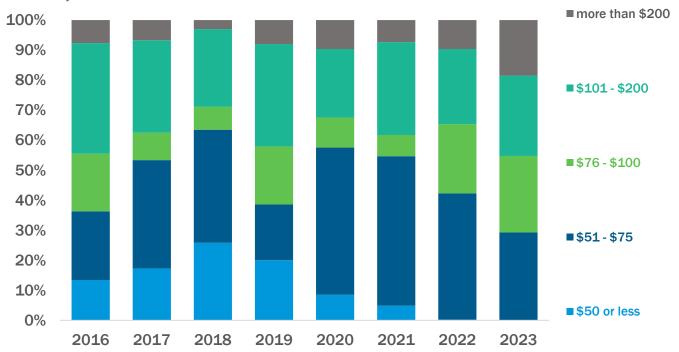


Figure 7: The distribution of the percentage of enrollees by average monthly fees from 2016 to 2023. Since 2016, fewer enrollees are enrolled in direct practices with \$50 or less monthly fees. The percentage of enrollees with higher average monthly fees has increased.

Monthly fee trends for direct practice clinics.

In 2023, 33.3% of direct practices charged more than \$100 in monthly fees.

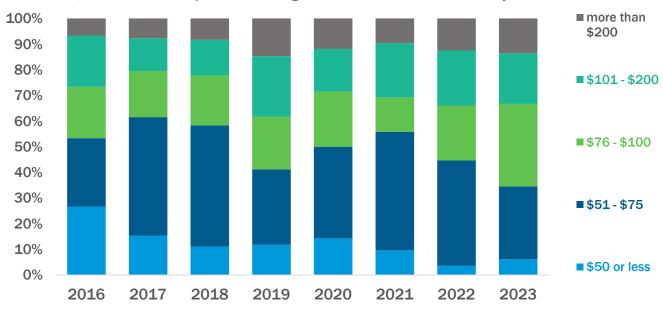


Figure 8: The distribution of direct practices by their average monthly fees charged, from 2016 to 2023. Since 2016, a higher percentage of direct practices charge fees of \$76 or more.

Direct practices and the insurance market

The OIC annual survey asks direct practice clinics if they collect information about patients' other health plans when patients enroll. In 2023, 45 of the 81 responding direct practices indicated they collect this information. Among these 45 direct practices, not all reported the breakdown of their patients' health coverage.

According to the clinics that reported this information, the number of direct practice clients who are uninsured (out of the 18,435 enrollees in direct practices that provided the OIC information about the number of uninsured individuals) are:

- Fiscal year 2023: 2,127 enrollees, or 11.5%
- **Fiscal year 2022:** 2,195 enrollees, or 13.3%
- **Fiscal year 2021:** 2,364 enrollees, or 10.57%

Under Washington state law, direct practices cannot bill insurers for primary care services provided under the direct practice agreement because this would result in "double dipping" or collecting payment twice. Patients are advised to obtain other insurance such as a high-deductible health plan, also called "catastrophic plans," to ensure that emergency and other services are covered.

The number of direct practice clients who have private insurance (non-Medicare, non-Medicaid) (out of the 18,444 that provided the OIC information about the number of privately insured individuals) are:

- **Fiscal year 2023:** Forty-four direct practices reported 9,164 enrollees who had private insurance, or 49.7% of enrollees.
- **Fiscal year 2022:** Thirty-eight direct practices reported 7,649 enrollees who had private insurance, or 46.3% of enrollees.
- **Fiscal year 2021:** Thirty-two direct practices reported 8,642 enrollees who had private insurance, or 38.6% of all enrollees.

Medicare enrollment figures (out of the 17,762 enrollees of direct practices that provided the OIC information about the number of individuals with Medicare):

- **Fiscal year 2023:** 4,600 enrollees or 25.9%.
 - o Forty direct practices reported Medicare enrollment figures for 2023.
- Fiscal year 2022: 4,121 enrollees or 25.1%
 - Thirty-five direct practices reported Medicare enrollment figures for 2022.
- Fiscal year 2021: 4,374 enrollees or 19.6%
 - o Twenty-two direct practices reported Medicare enrollment figures for 2021.
- **Fiscal year 2020:** 3,314 enrollees or 16.9%

Medicaid enrollment figures: (out of the 16,858 enrollees of direct practices that provided the OIC information about the number of individuals with Medicaid):

• **Fiscal year 2023:** 832 enrollees or 4.9%

- Forty direct practices reported Medicaid enrollment figures for 2023.
- **Fiscal year 2022:** 632 enrollees or 3.9%
 - o Thirty-five direct practices reported Medicaid enrollment figures for 2022.
- **Fiscal year 2021:** 589 enrollees or 2.6%
 - o Twenty-one direct practices reported Medicaid enrollment figures for 2021.
- **Fiscal year 2020:** 516 enrollees or 2.6%

Insurance coverage types for direct practice enrollees from 2019 to 2023

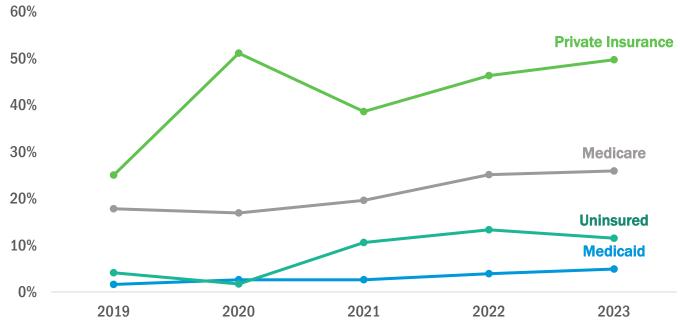


Figure 9: The types of insurance coverage that direct practice enrollees have, from 2019 to 2023. Since 2019, the share of enrollees with private insurance has increased at a faster rate than other coverage types.

Direct practice declined and discontinued patients

Discontinued patients

All 81 direct practices responded to the question of whether they had discontinued patients in the past year. Out of the 81 direct practices, 39 had discontinued patients within the past year.

Of the 39 direct practices that indicated they had discontinued patients, the average number of patients discontinued per practice was 35.6. The minimum was one, and the maximum number of discontinued patients was 554. Pacific Northwest Wellness Center, PLLC reported discontinuing 554 patients, "citing change in income", and "employer insurance" as reasons for the discontinuations. The next largest number of discontinuations was 99 at NFB LLC.

The following is a list of reasons direct practices discontinued patients in the past year.

Reasons for patient discontinuations

- Drug-seeking behavior
- Moved away
- Financial challenges
- Direct patient care services terminated
- Obtained employer insurance
- Patient death
- Change to HMO requiring in-network PCP
- Nonpayment
- Non-compliance with drug use agreement
- Patient requested to end services
- Change to Medicare
- Employer discontinued paying for membership
- Transfer to hospice/SNF

Declined patients

All 81 direct practices responded to the question of whether they had declined any patients. Sixteen direct practices indicated they had declined patients.

• Of the 16 direct practices, 15.4 was the average number of patients they declined. The minimum was one, and the maximum number of patients declined by a single direct practice within the past year was 100. Seattle Medical Associates reported declining 100 patients, and the next highest number of declined patients was 25, as reported by Equinox Primary Care PLLC, Emeral City Health PLLC and Bjurstrom & Lee PLLP.

The following is a list of reasons direct practices declined patients within the past year.

Reasons for declining patients

- Termination of program last year.
- Known drug abuser.
- Inappropriate social media messages prior to initial appointment.
- The practice is full or not taking new patients.
- Not a good fit for model of care advise to seek care elsewhere.
- Unable to work with patient insurance.
- Geographically too far away.
- The patient did not show up.

How direct practices evolved

Washington state is credited as the birthplace of direct practices because the first model started here in 1996:

- The American Medical Association and the American Academy of Family Physicians established ethical and practice guidelines for direct practices.
- In 2003, the federal establishment of Health Savings Accounts (HSA) promoted consumer-directed medicine, which includes direct practices.
- In 2003, the Society for Innovative Medical Practice Design formed and represents direct practice physicians. Its initial name was the American Society of Concierge Physicians.
- In 2004, the U.S. Office of the Inspector General for the Department of Health and Human Services warned practices about "double dipping," and started taking enforcement steps against physicians who charged Medicare beneficiaries extra fees for already covered services. This includes coordination of care with other health care provider, preventive services and annual screening tests. The practices were referred to under various names: concierge, retainer or platinum practices.
- In 2005, the U.S. Government Accountability Office issued <u>GAO Report 05-929</u>[‡], called "Physician Services: Concierge Care Characteristics and Considerations for Medicare." At the time, there were 112 "concierge physicians" nationwide who charged annual fees ranging from \$60 to \$15,000.
- In 2006, Washington state's Insurance Commissioner determined that retainer practices are insurance. West Virginia's commissioner made the same ruling in 2006.
- In 2007, Washington state became the first to define and regulate direct patient primary care practices and to prohibit direct practice providers from billing insurance companies for services provided to patients under direct practice agreements.
- In 2013, Washington state passed legislation establishing that direct practices may pay for charges
 associated with the dispensing, at no additional cost to the direct patient, of an initial supply of
 generic prescription drugs prescribed by the direct provider. The initial supply may not exceed 30
 days. In aggregate, payments for prescription drugs and lab and imaging services may not exceed
 15% of the direct fee charged to the patient (Chapter 126, Laws of 2013).

Federal health care reform

On March 23, 2010, President Obama signed The Patient Protection and Affordable Care Act, commonly known as the Affordable Care Act (ACA). It required the development of health benefit exchanges, starting in 2015, to help individuals and small businesses buy health insurance and qualify for subsidies available only for plans that are sold through an exchange.

Under the ACA, an exchange may only offer qualified health plans. Each plan must meet requirement standards and provide an essential benefit package. Essential health benefits include:

Ambulatory patient services

^{*} Link to GAO report: http://www.gao.gov/assets/250/247393.pdf

- Emergency services
- Hospitalization
- Maternity and newborn care
- Mental health and substance use disorder services, including behavioral health treatment
- Prescription drugs
- Rehabilitative and habilitative services and devices
- Laboratory services
- Preventive and wellness services and chronic disease management
- Pediatric services, including dental and vision care

Since Sept. 23, 2010, the ACA has required new health plans to eliminate cost-sharing requirements for evidence-based items or services that have an "A" or "B" rating from the U.S. Preventive Services Task Force.

Washington state's Exchange legislation

In 2012, the Washington state Legislature passed E2SHB 2319, "An act relating to furthering state implementation of the health benefit exchange and related provisions of the affordable care act." This is called "The Exchange Bill."

Section 8(3) of the bill, now codified as RCW 43.71.065(3), allows the Exchange Board to permit direct primary care medical home plans, consistent with Section 1301 of the ACA, to be offered on the Exchange as of Jan. 1, 2015.

Section 1301(a)(3) TREATMENT OF QUALIFIED DIRECT PRIMARY CARE MEDICAL HOME PLANS

The Secretary of Health and Human Services shall permit a qualified health plan to provide coverage through a qualified direct primary care medical home plan that meets the criteria established by the Secretary, so long as the qualified health plan meets all requirements that are otherwise applicable, and the services covered by the medical home plan are coordinated with the entity offering the qualified health plan.

The future of direct practices

The development of the ACA raises questions in the evolution of direct practices:

How do direct practices operate under the ACA?

Direct practices are not insurers and are only authorized to offer primary care services to their direct practice patients. Direct practices are not able to provide comprehensive health care. This means under the ACA, they are not qualified health plans eligible for sale through the Exchange.

The ACA specifies that a "qualified health plan" may provide coverage "through a qualified direct primary care medical home plan." As a result, direct practices may contract with insurers to provide primary care services in the insurer's qualified health plans in addition to offering direct practice services to patients. However, it cannot bill an insurer for services provided under a direct practice agreement.

How does the ACA affect consumers who have existing direct practice agreements?

The individual mandate responsibility provision of the ACA requires consumers to buy health insurance that provides for essential health benefits and covers emergency services. Direct practice agreements only provide primary care services and do not cover emergency services. As such, they do not qualify as health insurance, so they do not meet the individual mandate requirement. The mandate is not currently enforced, as the financial penalty for failure to obtain coverage was reduced to zero by Congress in 2017, effective in 2019.

The Washington Health Benefit Exchange (Exchange) opened in late 2014 and began selling policies that took effect starting Jan. 1, 2015. Enrollment both inside and outside of the Exchange for the individual market showed a dramatic increase, adding over 50,000 more health insurance enrollees. The enrollment in the individual commercial market has totaled between 200,000 and 250,000 enrollees over the last several years.

Consumers who buy health plans through the Exchange receive numerous benefits:

- If they meet income requirements, they're eligible for subsidies or premium tax credits, which are not available outside of the Exchange.
- Exchange health plans cover essential health benefits (EHBs), including but not limited to
 preventive services and chronic disease management. If a consumer pays a direct practice instead
 of buying a health plan that covers EHBs, the consumer only receives primary care, preventive
 services and chronic disease management services. Direct practices do not provide access to
 specialists or emergency care and the consumer must pay out-of-pocket for other medical services,
 including emergency or specialist services, unless they also obtain health insurance.
- If a consumer has health insurance, there are limitations on their maximum out-of-pocket expenses. A maximum out-of-pocket expense is the total of cost-sharing expenses, such as coinsurance and copayment, and the amount of the plan's annual deductible that the insured is required to pay, not including premiums. Once the limit is reached, a consumer does not pay for

additional cost-sharing expenses. However, consumers' costs associated with a direct practice do not count as cost-sharing expenses under most health plans and will not be applied to reduce the maximum out-of-pocket limitation because those services are not received as a part of a health plan benefit. For example, a direct practice provider is not a network provider and cannot bill health insurers regulated under RCW 48 for health care services because the consumer is paying for those services through the direct practice agreement and would result in double payment. Therefore, the consumer does not benefit from direct practice monthly fees counting toward annual maximum out-of-pocket expense limits.

Does federal health care reform bar direct practice arrangements from operating outside the Exchange?

Nothing in federal health care reform bars direct practice arrangements from operating outside the Exchange. There appears to still be a market for exclusive direct practices that cater to wealthier consumers and offer a concierge model, as well as for consumers who can't buy health care coverage on the Exchange, such as undocumented immigrants. In addition, some consumers simply join direct practices because they like the personal service, so these consumers may continue to use direct practices.

Recommendations for legislative modifications

Washington state is the historical birthplace for direct practice providers. Although direct primary care practices have not gained significant market share, they are present in 20 Washington state counties.

The annual survey contains questions providers must answer under the requirements of the bill and includes voluntary questions providers may answer. Since the providers are not required to answer all survey questions, it makes it difficult for the OIC to monitor direct practices for compliance with RCW 48.150. This prevents the OIC from requiring all providers to respond to questions related to RCW 48.150.020 and 48.150.050, about direct provider discrimination and employer contracts.

There is no practical means for the OIC to monitor direct practices for compliance with RCW 48.150, under the current legal framework. As a result, the Insurance Commissioner recommends legislative modifications, such as removing the term "voluntary data" from RCW 48.150.100(3) for clarity and adding language requiring direct practices to answer all annual survey questions asked by the Insurance Commissioner.



APPENDIX A: Annual statement form

This year, like last year, the OIC collected annual survey responses through an online form to make the process easier for providers and to receive timely responses. The questions were similar to paper statements issued in previous years. A summary of the questions are provided below.

\bigcirc	Practice name (Includ	le all names utilized, such as a DBA nam	e, so that all names ca	an be listed as registered).	
	Practice Name				
	DBA Name				
\bigcirc	If the practice utilizes	more than one name, please identify w	hich name should be t	the primary name that the prac	ctice will be listed under:
	Primary Name				
\bigcirc	Contact person for th	is statement:			
	Name				
	Title				
	Email Address				
	Phone Number				

 Will this contact pers 	on also be the person	to contact when	t is time to renew the registration? If no	t, please identify that person.
Name				
Title				
Email Address				
Phone Number				
○ What is the practice's	address?			
Name				
Company				
Address				
City/Town				
State/Province	_ select state	<u> </u>		
ZIP/Postal Code	_ select state	<u></u>		
Country				
Email Address				
Phone Number				

 Please answer, if the registered separately 	re is another practice location othe	er than the primary location	, please identify the practice l	ocation if the practices are not
Name				
Company				
Address				
City/Town				
State/Province		<u> </u>		
ZIP/Postal Code	- select state	<u> </u>		
Country				
Email Address				
Phone Number				
O Identify all affiliated	or partner direct care providers if y	 ou are part of a group of c	lirect care providers: (Please ir	nput "N/A" where not applicable)
Provider 1:				
Provider 2:				
Provider 3:				
Provider 4:				
○ What is the total nur	mber of patients currently enrolled	in your direct practice?		
○ What is the average	monthly membership fee?			

\bigcirc	Does the practice offer an	ı annual membership?	
	Yes		
	○No		
0	What is the average annu	al membership fee?	
\bigcirc	If the annual membership	funds are collected in advance for the year, has the practice established	set up a trust account?
	Yes		
	ONo		
\bigcirc	Is the practice providing a	any care to groups of people, such as employer groups as a part of the di	rect practice?
	No		
	If Yes, please describe:		
\bigcirc	Has the practice discontin	nued any patients?	
	YES / NO		
	A. If YES, how many patients has the direct practice discontinued?		
	B. If YES, what was/were the reasons for the discontinuation(s)?		

\bigcirc	Has the practice declined to accept any patients?
	YES / NO
	If Yes, how many patients did the practice decline to accept?
	If Yes, please specify the reason for declining to accept that patients:
\bigcirc	Do any of your clinic's direct practice providers participate as an in-network provider in a health carrier's network? Yes
	○ No
\supset	What percentage of the practice's business is direct practice?
\supset	What is the direct practice's website address:
\supset	When a new patient signs a direct practice agreement, does your clinic collect information about other health coverage the patient may have Yes
	○ No
\bigcirc	If you answered yes to question above, how many of your direct practice patients:

Have Medicaid	
Have Medicare	
Have private health Insurance Are uninsured	
Another form of health care	

APPENDIX B: Websites and addresses for direct practices

Direct practice name	Address	Website
Anchor Medical Clinic	1412 Castlewood Ct Freeland, WA	www.anchormedicalclinic.com
Assurance Healthcare & Counseling Center,		
LLC	3611 River Road Ste 200 Yakima, WA 98902	www.assurancehealth.org
Bellevue Medical Partners, PLLC	11711 NE 12th St Ste 2B Bellevue	www.bellevuemedicalpartners.com
Bjurstrom & Lee, PLLP	1231 116th Avenue NE, Suite 700 Bellevue, WA 98004	www.md2.com
Bliss Health and Wellness PLLC	18420 33rd Ave W Lynnwood, WA	https://www.blisshealthmd.com/
Bridge Primary Care, PLLC	231 MADISON AVENUE SOUTH Bainbridge Island, WA 98110	https://bridgeprimarycare.com/index.html
Capitol Hill Medical	901 Boren Ave suite 705 Seattle, WA	www.capitolhillmedical.com
Care Medical Associates, PLLC	1407 116th Ave NE Ste 102 Bellevue, WA 98004	www.cmadoc.com
ChymiyMattyMDLLC	19980 10th Ave NE, Suite 202, Poulsbo, WA 98370	www.pacificamedicine.com
Coho Medical Group, PLLC	1515 116th Ave NE, Suite 201 Bellevue, WA 98004	www.cohomedical.com
	4405 7th Ave SE Suites 200 - 201 PMB #0301, Lacey WA	https://www.facebook.com/p/Cosmas-Integrated-
Cosmas Integrated Care Solutions	98503	<u>Care-Solutions-100063761371757/</u>
DawnMD LLC	540 E Main Street Suite A Pullman, WA 99163	<u>www.dawn.md</u>
Destiny Direct Primary Care & Wellness Ctr PLLC	4401 Bridgeport Way W, University Place, WA 985466	www.destinydirect.net
Direct care Clinics US PC	2370 E 3rd Loop #203 Vancouver, WA 98661	www.deltadirectcare.com
Direct Primary Care	212 E Central Ave STE 360, Spokane, WA 99208	www.mydpcclinic.com
Docere Integrated Medicine	4329 A Street SE, Suite F Auburn, WA 98002	www.docereim.com
Dr Cranney Family Medicine	2020 E 29th Ave, Ste 235 Spokane, WA 99203	https://www.drcranney.com/
Dragonfly Medicine	18 HAVEN RD STE 210E Eastsound, WA 98245	https://www.salishseamedical.com/
Edmonds Health Clinic	221 4th Ave North Edmonds, WA 98020	www.edmondshealthclinic.com
Ellensburg Family Medicine	100 W 3rd Ave Ellensburg, WA 98926	https://www.compassdirecthealthcare.com/
Emerald City Health PLLC	1229 Madison Street, Suite 1290 Seattle, WA 98104	www.md2.com
Equinox Primary Care PLLC	2200 6th Ave. Suite 102 Seattle, WA 98121	www.equinoxprimarycare.com
Essential Direct Primary Care, PLLC	405 Black Hills Ln SW, Ste B2, Olympia, WA 98502	https://www.essentialdpc.com/p/dpc.html
Eventide Health	232 A Street, Unit 3 Friday Harbor, WA 98250	www.eventidehealth.com
Everside Health	2115 S. 56th St. Suite 310 Tacoma, WA 98409	www.eversidehealth.com

Direct practice name	Address	Website
Family and Wellness Medicine	34004 16th Ave S, Suite 100 Federal Way, WA 98003	www.fwmwa.com
Family Care Spokane	9631 N Nevada St Ste 202 Spokane, WA 99218	www.excelsiorwellness.org
Fern Lane Company LLC	708 E Morris St, Ste B. La Conner, WA 98257	https://www.thrivedirecthealthcare.com/
Focus Health DPC	5929 WESTGATE BLVD STE C Tacoma, WA 98406	www.focushealthdpc.com
Functional Health Solutions	302 Maple Ave Snohomish, WA 98290	https://solutionsbydrsam.com/
GoodMed Direct Primary Care	6553 California Ave SW, Suite A Seattle, WA 98136	www.goodmedclinic.com
HERITAGE FAMILY MEDICINE	4001 HARRISON AVE NW STE 101 Olympia, WA 98502	www.heritagefamilymedicine.com
Home Family Medicine	3601 W Washington Ave, Ste 160 Yakima, WA 98903	https://www.homefamilymed.com/
Ivy Direct Primary Care	1207 Washington Street suite 245 Vancouver, WA 98660	https://www.ivydirectprimarycare.com/
James and Lacambra PLLC	1600 East Jefferson Street Suite 500 Seattle, WA 98122	<u>www.seattlepremierhealth.com</u>
Jared M. Hendler, M.D. PLLC	231 Madison Ave S Bainbridge Island, WA 98110	www.hendlermd.com/direct-care
Joshua Hiep Le, DO PLLC	4300 Talbot Rd S Ste 105 Renton, WA 98055	https://www.elevatedimagehealthclinic.com/services
Koru Health PLLC	320 East 5th Street Port Angeles, WA 98362	https://koruhealthpa.com/
Lapis medicine, pllc	1010 S L Street Tacoma, WA 98405	https://www.lapisfamilymedicine.com/
Liberty Bell Family Medicine, PLLC	214 Glover Street N Twisp, WA 98856	https://libertybellfamilymedicine.com/
Lissa Lubinski MD PLLC	629 E 8th St Port Angeles, WA 98362	www.lissalubinskimd.com
Lupine Family Medicine	135 S. Worthen St Suite 200 Wenatchee, WA 98801	https://www.lupinemd.com/
Main Street Family Medicine	6000 NE 88th St, Ste D-102, Vancouver, WA 98665	www.mainstreetfamilymed.com
Manette Clinic Professional Service Corporation	1100 Wheaton Way, Suite F and G Bremerton, WA 98310	www.themanetteclinic.com
MB2K, LLC	10024 SE 240th St Suite 201 Kent, WA 98031	www.familycareofkent.com
MDseelig	2200 6th Ave Seattle, WA 98121	https://www.mdseelig.com/
Monarch Healthcare Solutions	216 S. Mission Ave. Wenatchee, WA 98801	https://www.monarchhealthcaresolutions.com/
NFB PLLC	6800 E. Green Lake Way N #200 Seattle, WA 98115	www.greenlakeprimarycare.com
North Star Clinic LLC	2120 Lawrence St, Port Townsend, WA 98368	https://www.northstar-clinic.com/
Novel Healthcare	7201 Pioneer Way STE B101, Gig Harbor, WA 98335	https://novel.healthcare
Nurture Well Center PLLC	1207 N 200TH ST Shoreline, WA 98133	www.nurturewellcenter.com
Olympic Medical Services, PS	3703 Ensign Road NE, Suite 10A	www.vantagephysicians.net
Oodle Family Medicine	401 Olympia Ave NE, Suite 300-MB48 Renton, WA 98056	www.oodlemd.com

Direct practice name	Address	Website
Pacific Northwest Wellness Center, Pllc	230 Grant Road Suite B-2 East Wenatchee, WA 98802	www.theredimediclinic.com
Perkinson Finch, PLLC	1101 Madison Street, Suite 1501, Seattle, WA 98104	www.md2.com
Pier View Chiropractic, Inc PS	19803 1st Ave. S, Suite 200 Normandy Park, WA 98148	www.pierviewchiropractic.com
prompt care direct llc	1930 9th St SE Puyallup, WA 98372	https://promptcaredirect.com/
Prudent Medical Providers NW	6718 144th St NW Gig Harbor, WA 98332	www.soundclinicalmedicine.com
Public Hospital District No 4, King County	9801 Frontier Ave SE Snoqualmie, WA 98065	www.snoqualmiehospital.org
PWYC Healthcare	3312 French loop nw Olympia, WA 98502	https://www.paywhatyoucanprimarycare.org/
Quick Clinic	2526 COLONIAL DR. Centralia, WA 98531	www.washingtonpark.md
Revitalize Metabolic Health PLLC	6625 Wagner Way NW, Suite 201 Gig Harbor, WA 98335	https://revitalizemetabolichealth.com/
Revive Innovative Healthcare PLLC	106 Plaza Drive, Building C1 Yelm, WA 98597	www.revivefamilymedicine.com
Ridgefield Family Medicine	8507 S. 5th Street Suite 113 Ridgefield, WA 98642	www.ridgefieldfmailymedicine.com
RIVER VALLEY HEALTH PLLC	424 WILLIAMS STREET, MOSSYROCK WA 98564	https://rivervalleyhealth.org/
Seattle Medical Associates	1124 COLUMBIA ST Seattle, WA 98104	www.seattlemedicalassociates.com
Sound Medicine & Wellness	3216 NE 45th Place, Suite #213 Seattle, WA 98105	www.soundmedicineandwellness.com
Sunny Family Medicine	3908 Creekside Loop Suite 125 Yakima, WA 98902	https://www.sunnyfamilymedicine.com/
Swedish Family Medicine Ballard	1801 NW Market St. Suite 403 Seattle, WA 98107	www.swedish.org
The ROW Health Collective	8100 Bracken Place SE Snoqualmie, WA 98065	www.row.health
Thread Health, PLLC	624 W. Hastings Rd Suite 11 Spokane, WA 99218	https://www.threadhealthclinic.com/
Thurston Internal Medicine, PLLC	420 McPhee Rd SW, Ste C Olympia, WA 98502	https://www.thurstoninternalmedicine.com/
Total Collision & Injury	1776 Fowler St Richland, WA 99352	www.totalcaretricities.com
transforMD Primary Care	1133 164th ST, SW Suite 206 Lynnwood, WA 98087	www.transformdpc.com
Urgent Medical Center	14201 NE 20th Avenue, Ste C101 Vancouver, WA 98686	www.evermeddpc.com
Vancouver Direct Primary Care LLC	1600 columbia street Vancouver, WA 98660	www.vancouverdirectprimarycare.com
Vigil Family Medicine PLLC	1901 S. Union Ave Ste B4003 Tacoma, WA 98405	www.vigilmd.com
Vintage Direct Primary Care	19319 7th Ave NE #114 Poulsbo, WA 98370	www.vintagedpc.com
Waters Edge Family Practice & Wellness	221 2nd Street Suite 6A, PO BOX 1327 Langley, WA	
Center	98260	<u>www.watersedgewellnesscenter.com</u>
Weller are Bire at Cours	3707 Providence Point Dr. SE, Suite C Issaquah, WA	hatta and for a second
Wellness Direct Care	98029	https://www.wellnessdirectcare.com/
Wise Patient Internal Medicine, PLLC	613 19th Ave. E, Ste. 201 Seattle, WA 98112	<u>www.imwisepatient.com</u>

APPENDIX C: Voluntary information statistics

Practice name	Has the practice discontinued any patients within the past year?	Has the practice declined any patients?	Do any of your clinics' direct practice providers participate as an in-network provider in a health carrier's network?	What percentage of the practice's business is direct practice?	Does your clinic collect information about other health coverage the patient may have?	Number of patients who have Medicaid	Number of paitents who have Medicare	Number of patients who have private health insurance	Number of patients who are uninsured	Number of patients who have another form of health care coverage
Anchor Medical										
Clinic	Yes	Yes	No	100.0%	Yes	3	44	0	1	0
Assurance Healthcare &										
Counseling Center, LLC	Yes	No	No	100.0%	No	NA	NA	NA	NA	NA
Bellevue Medical	163	NO	140	100.076	NO	IVA	IVA	IVA	IVA	IVA
Partners, PLLC	No	No	No	100.0%	Yes	0	350	250	0	0
Bjurstrom & Lee, PLLP	No	Yes	No	100.0%	No	NA	NA	NA	NA	NA
Bliss Health and Wellness PLLC	Yes	No	No	100.0%	Yes	3	NA	2	3	NA
Bridge Primary Care, PLLC	No	No	No	100.0%	No	NA	NA	NA	NA	NA
Capitol Hill Medical	Yes	No	Yes	1.0%	Yes	12	5	9	10	NA
Care Medical										
Associates, PLLC	No	Yes	No	73.0%	Yes	0	67	180	6	15
ChymiyMattyMDLLC	Yes	No	Yes	3.5%	Yes	0	0	0	140	NA
Coho Medical Group, PLLC	Yes	No	Yes	50.0%	Yes	3	20	172	49	NA
Cosmas Integrated Care Solutions	No	No	No	3.0%	Yes	0	0	4	0	0

DawnMD LLC	Yes	No	No	100.0%	Yes	15	10	250	25	10
Destiny Direct										
Primary Care &										
Wellness Ctr PLLC	Yes	No	No	99.0%	Yes	35	25	84	101	15
Direct care Clinics										
US PC	No	Yes	No	100.0%	No	NA	NA	NA	NA	NA
Direct Primary Care	Yes	No	No	100.0%	No	NA	NA	NA	NA	NA
Docere Integrated										
Medicine	No	No	No	100.0%	Yes	NA	NA	500	2	NA
Dr Cranney Family										
Medicine	No	No	No	100.0%	No	NA	NA	NA	NA	NA
Dragonfly Medicine	Yes	No	No	100.0%	Yes	2	45	45	0	8
Edmonds Health										
Clinic	No	No	Yes	9.0%	Yes	NA	NA	38	57	NA
Ellensburg Family										
Medicine	Yes	No	No	100.0%	Yes	5	15	65	10	5
Emerald City Health										
PLLC	No	Yes	No	100.0%	No	NA	NA	NA	NA	NA
Equinox Primary										
Care PLLC	Yes	Yes	No	100.0%	Yes	15	20	75	5	0
Essential Direct										
Primary Care, PLLC	Yes	No	No	40.0%	No	NA	NA	NA	NA	NA
Eventide Health	Yes	Yes	No	100.0%	Yes	30	360	195	15	NA
Everside Health	Yes	No	No	100.0%	No	NA	NA	NA	NA	NA
Family and Wellness										
Medicine	Yes	No	Yes	20.0%	No	NA	NA	NA	NA	NA
Family Care										
Spokane	Yes	Yes	Yes	0.0%	No	NA	NA	NA	NA	NA
Fern Lane Company										
LLC	Yes	No	Yes	50.0%	No	NA	NA	NA	NA	NA
Focus Health DPC	No	No	No	100.0%	Yes	0	0	0	0	0
Functional Health										
Solutions	No	No	Yes	100.0%	No	NA	NA	NA	NA	NA
GoodMed Direct										
Primary Care	No	No	No	100.0%	No	NA	NA	NA	NA	NA

HERITAGE FAMILY										
MEDICINE	No	No	Yes	0.0%	No	NA	NA	NA	NA	NA
Home Family										
Medicine	Yes	No	No	100.0%	Yes	57	7	133	83	13
Ivy Direct Primary										
Care	No	No	No	0.0%	No	NA	NA	NA	NA	NA
James and										
Lacambra PLLC	No	No	No	100.0%	Yes	NA	414	493	5	0
Jared M. Hendler,										
M.D. PLLC	No	No	No	100.0%	Yes	0	24	53	8	NA
Joshua Hiep Le, DO										
PLLC	No	Yes	Yes	50.0%	No	NA	NA	NA	NA	NA
Koru Health PLLC	Yes	No	No	100.0%	No	NA	NA	NA	NA	NA
Lapis medicine, pllc	No	No	No	100.0%	Yes	0	0	3	0	0
Liberty Bell Family										
Medicine, PLLC	No	No	Yes	90.0%	Yes	0	1	9	1	0
Lissa Lubinski MD										
PLLC	No	No	No	95.0%	No	NA	NA	NA	NA	NA
Lupine Family										
Medicine	No	No	No	100.0%	No	NA	NA	NA	NA	NA
Main Street Family										
Medicine	No	Yes	No	100.0%	Yes	30	15	655	313	45
Manette Clinic										
Professional Service										
Corporation	Yes	No	Yes	45.0%	Yes	168	836	517	266	69
MB2K, LLC	Yes	Yes	Yes	0.0%	Yes	0	0	1	1	0
MDseelig	No	No	No	100.0%	No	NA	NA	NA	NA	NA
Monarch										
Healthcare										
Solutions	No	No	No	100.0%	No	NA	NA	NA	NA	NA
NFB PLLC	Yes	No	No	60.0%	Yes	5	0	415	102	0
North Star Clinic LLC	Yes	No	Yes	8.5%	Yes	0	0	0	34	0
Novel Healthcare	No	No	No	100.0%	Yes	16	7	134	13	15
Nurture Well Center										
PLLC	Yes	No	No	100.0%	No	NA	NA	NA	NA	NA

Olympic Medical										
Services, PS	Yes	No	No	100.0%	Yes	61	285	460	84	6
Oodle Family										
Medicine	Yes	No	No	100.0%	Yes	15	8	144	64	4
Pacific Northwest										
Wellness Center,										
Pllc	Yes	No	No	90.0%	No	NA	NA	NA	NA	NA
Perkinson Finch,										
PLLC	No	Yes	No	100.0%	No	NA	NA	NA	NA	NA
Pier View										
Chiropractic, Inc PS	Yes	No	No	55.0%	Yes	3	0	15	30	0
prompt care direct										
Ilc	No	No	No	100.0%	No	NA	NA	NA	NA	NA
Prudent Medical										
Providers NW	No	No	Yes	1.0%	No	NA	NA	NA	NA	NA
Public Hospital										
District No 4, King						_		_	_	
County	Yes	No	Yes	0.0%	Yes	0	0	0	0	0
PWYC Healthcare	No	No	No	100.0%	Yes	NA	NA	NA	NA	3
Quick Clinic	Yes	Yes	No	95.0%	Yes	136	389	773	276	16
Revitalize Metabolic										
Health PLLC	Yes	No	No	25.0%	No	NA	NA	NA	NA	NA
Revive Innovative										
Healthcare PLLC	No	No	No	60.0%	No	NA	NA	NA	NA	NA
Ridgefield Family										
Medicine	No	No	Yes	1.0%	Yes	NA	NA	9	NA	NA
RIVER VALLEY										
HEALTH PLLC	No	No	No	100.0%	No	NA	NA	NA	NA	NA
Seattle Medical										
Associates	Yes	Yes	No	100.0%	Yes	33	1198	1538	179	0
Sound Medicine &										
Wellness	No	No	No	100.0%	Yes	3	100	100	2	NA
Sunny Family										
Medicine	Yes	No	No	100.0%	No	NA	NA	NA	NA	NA
Swedish Family										
Medicine Ballard	No	No	Yes	1.0%	No	NA	NA	NA	NA	NA

The ROW Health										
Collective	No	No	No	100.0%	No	NA	NA	NA	NA	NA
Thread Health, PLLC	No	No	No	100.0%	Yes	8	0	145	2	0
Thurston Internal										
Medicine, PLLC	No	No	No	100.0%	Yes	3	134	203	2	NA
Total Collision &										
Injury	No	No	Yes	0.2%	Yes	0	0	0	10	0
transforMD Primary										
Care	Yes	No	No	100.0%	No	NA	NA	NA	NA	NA
Urgent Medical										
Center	No	No	Yes	1.0%	No	NA	NA	NA	NA	NA
Vancouver Direct										
Primary Care LLC	No	No	No	100.0%	No	NA	NA	NA	NA	NA
Vigil Family										
Medicine PLLC	Yes	No	No	100.0%	Yes	19	3	92	31	0
Vintage Direct										
Primary Care	Yes	No	No	100.0%	Yes	92	157	528	153	32
Waters Edge Family										
Practice & Wellness						_				_
Center	Yes	Yes	No	100.0%	Yes	8	51	120	2	5
Wellness Direct						_			_	_
Care	No	No	No	100.0%	Yes	0	10	68	2	0
Wise Patient										
Internal Medicine,			V	05.00/		5 0		607	40	
PLLC	Yes	Yes	Yes	85.8%	Yes	52	0	687	40	0