



June 28, 2016

VIA E-Mail ins.rules@oregon.gov

Department of Consumer and Business Services
350 Winter Street NE
Salem, OR 97309

RE: Kaiser Foundation Health Plan of the Northwest's comments regarding the Oregon Division of Financial Regulation proposed rules establishing standards for the adequacy on an insurer's network of health care providers.

Thank you for the final opportunity to submit comments regarding the proposed rules prescribing network adequacy and annual network reporting requirements beginning in March of 2017.

Kaiser Foundation Health Plan of the Northwest has over 60 years of experience as an integrated care delivery system in Oregon and Washington and we are committed to providing affordable, high quality healthcare services to improve the health of our enrollees and the communities we serve. We appreciate that Oregon is creating new requirements for insurers to certify they are providing members adequate access to providers within their networks. We also appreciate DFR's willingness to work with stakeholders and consumer advocates to design an effective and thoughtful approach to this process that begins in 2017.

We support DFR's decision in giving insurers the option of either using the approved nationally recognized standards (OAR 836-053-0330) or the factor based evidence approach (OAR 836-053-0340) to show compliance with the network adequacy standards. The flexible, factor-based approach of evaluating networks will give DFR reasonable assurance that the insurer provides timely access to appropriate, high quality of care. As outlined in OAR 836-053-0340, insurers can demonstrate by showing a much more detailed view of the member experience and satisfaction.

In our review of the proposed rules, we have one request for clarification. We ask that DFR provide more guidance, once the rules are final, regarding the required format of these annual reports and the dates insurers must use when extracting the applicable data for their submissions in March of next year.

Again, our organization would like to express its appreciation for the opportunity to comment and DFR's work on the proposed rule. We hope you find this feedback helpful as you finalize the proposed rule and bulletin. Please contact us if you have questions or would like to discuss our comments.

Respectfully,
Brian Hunter
Director, Regulatory Services and Contract Management
Kaiser Foundation Health Plan of the Northwest