

From: Cooper, Mary Anne <MaryAnne.Cooper@cambiahealth.com>
Sent: Monday, December 11, 2023 2:44 PM
To: GRIFFITH Numi L * DCBS <Numi.L.GRIFFITH@dcbs.oregon.gov>
Cc: WINKEL Karen J * DCBS <Karen.J.WINKEL@dcbs.oregon.gov>; Awuakye, Antoinette <Antoinette.Awuakye@cambiahealth.com>
Subject: RE: Rulemaking - PBM/Insurer Reporting SB 192

Hi Numi,

I wanted to let you know that we agree with the comment raised by the PBMs during the last meeting on SB 192. Specifically, we share the following concerns that were raised during the meeting on the draft rules:

- 1) We agree that all data needs to be reported on an aggregate level. Specifically, Regence has a partial ownership interest in Prime, and any data reported by Prime would be easily attributable to Regence. It was the intent and plain wording of the legislation that reporting not identify a carrier. Therefore, DCBS needs to ensure that it is reporting data in a manner that carrier data is protected.
- 2) We want to confirm that DCBS is excluding self-insured ERISA plans that are not subject to DFR oversight. We believe that is the intent of the language, but there was some confusion at the meeting.
- 3) We also agree with the concern raised by the PBMs that group purchasing organization reporting was not part of the scope of SB 192, and should not be included.

Please let us know if you have any questions.

Mary Anne

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