



Regulatory Affairs

Antoinette Awuakye

(503) 553-1521 Voice

(503) 225-5431 Facsimile

antoinette.awuakye@cambiahealth.com

Reply to:

P.O. Box 1271 (M/S E12B)

Portland, OR 97207-1271

October 9, 2023

Lisa Emerson

Senior Health Insurance Programs Analyst

Department of Consumer and Business Services, Division of Financial Regulation

PO Box 14480

Salem, OR 97309

SENT VIA EMAIL

RE: Comments on 9-29-23 SB 1529 PCP Assignment Draft Rules

Dear Mrs. Emerson:

Thank you for the opportunity to provide comments on the September 29, 2023 draft of the PCP Assignment rules. The latest draft reflects significant changes that resolves some of the issues that were raised by payors at the September 25, 2023 RAC meeting. The latest draft is moving in the right direction.

While our concerns with violation of HIPAA is resolved in this draft, we are concerned about 4(a) which provides as follows:

.... "In order to prioritize enrollee choice of primary care provider, Insurers must make all reasonable efforts to communicate with enrollees to complete an initial primary care provider assignment."

Our "reasonable efforts" will be to have the member include the information in their paper or online application if they are a new enrollee, and for existing enrollees, they will be mailed a letter.

Given the late rulemaking, the opportunity to amend the enrollment application forms which have been approved by the DFR and get our systems configured to mail letters to enrollees at the beginning of the calendar year requesting that they chose their PCP has passed. Therefore, our systems will be unable to generate letters by January 1, 2023 about their PCP choice selection.

As such, we respectfully request that the enrollee communication be pushed back to July 1, 2023 to allow us to configure our systems and have it ready.



Thank you.

Sincerely,

A handwritten signature in purple ink, reading "A. Awuakye", is displayed on a light beige rectangular background.

Antoinette Awuakye
Senior Public and Regulatory Affairs Specialist

Cc: Mary Anne Cooper
Marlena Osbourne