December 30th, 2019

Scott Bird
Office of the Insurance Commissioner
302 Sid Snyder Ave., SW
Olympia WA 98504


Dear Mr. Bird,

Thank you for the opportunity to comment on the preproposal statement of inquiry on CR-101, impacting prescription drug utilization management, which will begin the process of developing rules to establish how notice would be given to participating providers and patients given the new standard process requirements and external review options that passed under EHB 1879.

The National Psoriasis Foundation (NPF) is a non-profit organization with a mission to drive efforts to cure psoriatic disease and improve the lives of those affected. The NPF is the leading patient advocacy group for more than 8.3 million Americans and the roughly 186,424 Washington residents living with psoriasis and psoriatic arthritis. The NPF is intimately familiar with utilization management practices in prescription drug benefits and come to you with a unique perspective on how these policies impact care, health outcomes, and the overall well-being of thousands of Washingtonians.

We applaud the Office of the Insurance Commissioner (OIC) for convening a stakeholder meeting on January 16th and their continued effort to engage patient groups through the process. After the stakeholder meeting we had concerns with the lack of clarity in WAC 284-43-2023 regarding timeframes for exception and substitution requests, specifically section 3, “A carrier may establish a specific reasonable time frame for submission of the additional information, and may deny the request if the information is not received within that time frame.” We believe there should be a backstop on what a reasonable time frame should be to ensure all stakeholders have a clear understanding of the process and time frame allotted for decisions. We encourage OIC to use the time frames in WAC 284-43-2050 10aii(B) for standard exceptions or substitutions, and 10bii(B) for expedited exceptions or substitutions which is four calendar days of the receipt of the information of the deadline for receiving information, whichever is sooner. This would create uniformity in the time frames and provide clarity to patients and providers.

Thank you for your time and consideration. If you have questions or concerns, please contact Brittany Duffy-Goche, State Government Relations Manager with the National Psoriasis Foundation, at bduffy-goche@psoriasis.org.