



May 6, 2014

Mr. Jason R. P. Crabbe
Rules and Publications Program Manager
Health Care Authority
mailto:jason.crabbe@hca.wa.gov

Comments on CR-102: WACs 182-550-1050, 2511, 2570, 2800, 2900, 3000, 3010, 3020, 3100, 3150, 3200, 3250, 3381, 3450, 3460, 3800, 3900, 4000, 4100, 4300, 4400, 4800, and 7050 Submitted by e-mail 05/06/14

Dear Mr. Crabbe,

Thank you for the opportunity to comment on these draft rules on hospital payment. We appreciate HCA's response to our previously submitted comments to the stakeholder exposure draft.

We are still concerned that the rulemaking communication process followed by the Health Care Authority (HCA) limits stakeholder involvement, since the existence of and copies of stakeholder drafts are only known and provided to those who knew to respond to the CR-101 for the specific WACs. We have initiated steps to ensure we respond to any relevant CR-101 notices and are advising our members to do the same, but we believe the process does exclude many from being aware of, or commenting on, exposure drafts.

In addition, we find it very difficult to comment on changes in proposed rules when changes are done on a piecemeal basis. We think the agency should release and allow comment on all the rules that impact the new inpatient and outpatient system as a complete entity, rather than releasing parts that may relate to each other on an individual basis.

We thank HCA for letting us know that the specifics regarding the nature and application of the budget neutrality factor would be addressed in separate rulemaking. We have received that exposure draft and plan to submit comments as we continue to have serious concerns about HCA's plans to implement a prospective adjustment/reduction to rates.