January 6, 2022

The Honorable Eileen Cody  
Washington House of Representatives  
303 John L. O'Brien Building  
PO Box 40600  
Olympia, WA 98544

Re: Support for HB 1688, Conforming Washington State Law to the Federal No Surprises Act

Dear Representative Cody,

On behalf of OCHIN, I appreciate the opportunity to offer support for HB 1688, which conforms Washington state law to the federal No Surprises Act. Ensuring conformity and standardization is crucially important when regulating medical billing and insurance. Disparate and confusing laws complicate patient notice (and potentially) access as well as provider compliance obligations and payment, resulting in burdensome red tape. Keeping Washington law aligned with federal law reduces unnecessary administrative duplication and inconsistencies.

OCHIN is a national health research network and continuous learning health system collaborative and offers technology solutions, informatics, evidence-based research, and policy insights. OCHIN network members in Washington provide care to more than 292,000 patients and had more than 845,000 visits in 2021. For over two decades, OCHIN has advanced equitable health care solutions by leveraging the strength of our network’s unique data set and the practical experience of our members to drive technology innovation at scale for patients and providers in underserved communities.

Given the complexity of the federal No Surprises Act and the difficulty implementation has created for Washington community-based providers, OCHIN appreciates efforts to promote administrative simplification and harmonization of state and federal requirements. COVID-19 has stretched community provider resources thin, and reductions of bureaucratic complexity is extremely important in limiting excess work. Ensuring that state law does not conflict with the No Surprises Act, or require additional action from providers to comply, will allow providers to fully understand and adhere to the law.

Reducing unexpected and costly medical bills is essential to ensure patients are not hesitant to receive care. Ensuring patients are not confused by different notification requirements while ensuring provider resources are directed to patient care is also critical during this pandemic and for providers in underserved communities. Please contact me at stollj@ochin.org to discuss implementation and provider and patient impacts.

Sincerely,

Jennifer Stoll  
Executive Vice President  
Government Relations & Public Affairs