



Lisa Hamilton
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Submitted via email

September 28, 2018

Attn: Mary E. Kosinski
Arizona Department of Insurance
100 N. 15th Ave., Suite 102
Phoenix, AZ 85007-2624
public_comments@azinsurance.gov

RE: Out-of-Network Claim Dispute Resolution Proposed Rules

Dear Ms. Kosinski:

Thank you for the opportunity to provide feedback to the Department during the important rulemaking process. Aetna is supportive of the goal to remove our enrollees from the middle of claim disputes involving surprise out-of-network bills. Below are our questions/comments on the draft rules:

Informal Teleconference

- 1) When an informal teleconference is initiated, will the Department secure written permission from the enrollee to discuss PHI?
- 2) Is the subject of the informal telephone conference limited to a payment dispute or could the conference also include discussion about policies and medical appropriateness utilized during the appeal process?
- 3) Insurers are required to provide documentation during or before the telephone conference. Will the Department provide a form standardizing the required documents for the teleconference?

Communication between Department and Insurer

- 1) The Department will make outreach to the insurer for additional information (if needed), and provide notification of a request for an informal teleconference. How will the Department contact the insurer? Likewise, the insurer will provide notification to the Department of the outcome of an informal teleconference. How will the insurer provide the necessary notifications to the Department? Aetna suggests use of a secure web portal or a designated email box.

Settlement

- 1) If the parties settle the qualifying out-of-network bill at the Informal Settlement Teleconference, insurers are required to process the claim within 30 days after the conference call. Aetna recognizes that an EOB will be issued. What other notice requirements, if any, are insurers required to make after a settlement is reached?

Sincerely,

A handwritten signature in black ink that reads "Lisa Hamilton". The signature is written in a cursive, flowing style.

Lisa Hamilton

CC: Mary Anderson
Rajini Sharma
Shannon Butler