



Mary R. Kosinski  
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Sent via email: [mkosinski@azinsurance.gov](mailto:mkosinski@azinsurance.gov)

Dear Ms. Kosinski,

The undersigned are submitting our comments on the Department of Insurance (DOI) draft proposed rules on out-of-network "surprise billing" on behalf of the Arizona Nurses Association (AZNA), the Arizona Association of Nurse Anesthetists (AZANA), the Arizona Nurse Practitioner Council and the American College of Nurse Midwives, Arizona Chapter.

We appreciate the work of DOI staff on this important and complex issue, as we believe that it is very important to consumers and their ability to afford health care and we also appreciate efforts to make the process as fair as possible for all parties. Advance Practice Registered Nurses such as Certified Registered Nurse Practitioners (CRNAs), Nurse Practitioners (NPs) and Certified Nurse Midwives (CNMs) face similar challenges as the physician community when providing services as an out-of-network provider.

The Arizona Medical Association (ARMA) and the Arizona Osteopathic Medicine Association (AOMA) have graciously shared their comments on the draft proposed rules with us and in general we agree with their comments. We also believe that adequate and appropriate notice of a qualifying surprise out-of-network bill settlement conference and arbitration be provided. While we are supportive of the flexibility of allowing a provider to determine who should present them in the process (the provider of services, a billing representative or other administrative staff) it is important that sufficient time be provided between the notice and the proposed settlement conference to allow the appropriate person to be available for the conference.

We echo the sentiments expressed in the ARMA and AOMA letter regarding the flexibility of scheduling for the settlement conference and arbitration; as well as the qualification and fees for arbitrators. We believe their proposals regarding the qualifications and fees are good suggestions.

Thank you for the opportunity to comment on these important rules and we look forward to continuing to work with you as you move forward.

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