

## **TPA / Blues Exemption from WVA Registration Policy**

### **Background**

The legislation preserving universal purchase of childhood vaccines and creating the Washington Vaccine Association (WVA), HB 2551, requires Third Party Administrators (TPAs) to register with the Washington State Department of Licensing (DOL).<sup>1</sup> By rulemaking, certain TPAs are allowed to register with WVA rather than with DOL. TPAs include entities that adjust or settle claims on or for state residents or health care providers. Health carriers, including for-profit and nonprofit health plans and HMOs, are not required to register. The issue has been raised whether out-of-state Blue companies are required to register.

Required TPA registration began on September 1, 2010; all TPAs must renew their registrations on an annual basis thereafter prior to December 31 of each year. In-state companies need to register through the DOL website, while out-of-state companies can register with the WVA by completing a form on the WVA website.

The Blue Cross Blue Shield Association (BCBSA) is comprised of over 35 independent and locally operated Blue Cross and Blue Shield companies that collectively provide health insurance coverage to over 90 million Americans in every state.

BCBSA's BlueCard® Program enables members to receive healthcare services wherever they live or travel. BlueCard links participating healthcare providers and the independent Blue Cross and Blue Shield companies across the country through a single electronic network for claims processing and reimbursement. Premera BlueCross and Regence BlueShield in WA both participate as licensees in the BlueCard Program and process claim payments for out of state Blue companies. BlueCard payments comprise approximately 20% of Premera's and Regence's regular monthly assessment payments.

All out of state BCBSA licensees are required to process WA-service claims through either Premera or Regence. Premera BlueCross and Regence BlueShield will process DBA assessments related to the members of these Plans pursuant to BCBSA policies and standards.

### **Policy**

WVA will not require an out-of-state Blue plan which through the BlueCard program maintains compliance with WVA payment obligations via Premera BlueCross or Regence BlueShield to register as a TPA either via the DOL or the WVA website.

*Public Notice of Policy:* WVA will add a note under the TPA portion of the website as follows:

Any member of the Blue Cross Blue Shield Association which maintains timely compliance with its payment obligations to the Washington Vaccine Association, in accordance with the BlueCard® system, via Premera BlueCross or Regence BlueShield is exempt from registration.

### **Rationale**

Under the BlueCard claim process, the DBA reimbursements for out-of-state Blues are included in the local vouchers and payments made by Premera Blue Cross and Regence Blue Shield. Since all claims and DBA assessments are handled by the local Blue Plans, there are sufficient controls in place to ensure reimbursement and compliance by out-of-state Blue Plans.

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<sup>i</sup> SSHB 2551, Sec. 9 (1)(a)