

**BRUYNS Fred H \* DCBS**

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**From:** Chris P Kafka <Christopher.P.Kafka@kp.org>  
**Sent:** Tuesday, February 13, 2018 3:07 PM  
**To:** BRUYNS Fred H \* DCBS  
**Cc:** FIELDS Stanley \* DCBS  
**Subject:** Division 10 Rules Changes

Dear Fred,

Please consider this email as testimony regarding the proposed revisions to the division 10 rules. Specifically the amendments being proposed to OAR 436-010-0270(4) regarding insurers duties under MCO contracts.

We would suggest that the division include in the rules minimum requirements for the information that the insurer needs to provide the MCO regarding a worker's representation by an attorney, whether that information is provided at the time of enrollment or some time thereafter. At a minimum we suggest that the insurer should provide the attorney's name, mailing address, phone and fax numbers, and an email address. Having this information will enable the MCO to comply with requirements to include all interested parties on our decision notices without placing an undue administrative burden on the MCO.

Please let me know if you have questions or would like further clarification regarding this testimony.

Thanks, Chris

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**Chris Kafka, MBA**  
Director, Occupational Health  
Kaiser On-the-Job® Administrator

**Kaiser Permanente**  
Occupational Health  
7201 N Interstate Ave., Ste. 195  
Portland, OR 97217  
(503) 735-7411 (office)  
26-7411 (tie-line)  
(866) 558-5123 (fax)  
(503) 522-3922 (mobile phone)  
(503) 735-7415 (assistant)

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