



Bulletin B 25-05

**TO: ALL INSURERS AUTHORIZED TO TRANSACT HEALTH INSURANCE BUSINESS
IN THE STATE OF ALASKA AND OTHER INTERESTED PARTIES**

**RE: INSURER EMPLOYEE IDENTIFICATION IN GRIEVANCE COMMUNICATIONS;
REGISTERED INDEPENDENT REVIEW ORGANIZATIONS**

Due to heightened concerns related to the personal safety of insurance company employees, the division is aware that several health insurance companies wish to modify their consumer facing communications by removing identifying details of employees.

Under Alaska's grievance regulations, 3 AAC 28.936(b), requires insurers to provide to a covered person or their representative, "the name, address, and telephone number of the person or organizational unit designated" by the insurer to coordinate a grievance review. Further, subsection (o) requires that a grievance decision must include "the name, title, and qualifying credentials of each person participating as a reviewer in the review process".

The division recognizes the increased threats and risks being made to insurance company staff and agree that additional care is currently needed. The Director will forbear from administrative action against an insurer that does not provide the names of reviewers for grievances required by 3 AAC 28.936(b) and (o) if the insurer otherwise adheres the grievance regulations.

Instead of providing the full name of the employee on the required consumer facing communications, the company may include the first name and first initial of the last name of such employees or provide an alpha-numeric identifier as long as the actual reviewer is able to be tracked internally. Insurers may also submit an alternative identifier option to the Director for consideration.

Insurers, their contractors, and Independent Review Organizations must be prepared to provide the full names of reviewers to the division upon request under AS 2109.320(c). Please note that the division will hold such information confidential pursuant to AS 21.06.060(f) and (g).

The division intends for this forbearance to be temporary until such time as a long-term solution may be completed through rulemaking. This bulletin expires on January 24, 2026.

Questions regarding this bulletin should be directed to Sarah Bailey via email
sarah.bailey@alaska.gov.

Dated January 24, 2025

DocuSigned by:
Lori Wing-Heier
A304E2801107490
Lori Wing-Heier
Director