Direct Practices in Washington State

Annual report to the Legislature December 2021

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Executive Summary

In 2007, the Washington State Legislature enacted Engrossed Second Substitute Senate Bill 5958, codified as <u>Revised Code of Washington (RCW) 48.150</u>. This bill created a new primary health care delivery option called direct patient-provider primary care practices or "direct practices."

The bill requires the Office of the Insurance Commissioner (OIC) to report annually to the Legislature on direct practices. Under RCW 48.150.100(3), this includes, but is not limited to, "participation trends, complaints received, voluntary data reported by the direct practices and any necessary modifications to this chapter."

In a direct practice, a health care provider charges a patient a set monthly fee for all primary care services provided in the office, regardless of the number of primary care visits or care provided. No insurance plan is involved, although patients may have separate insurance coverage for more costly medical services. Direct practices are sometimes called "retainer" or "concierge" practices.

The 2021 direct practices annual report analyzes the last three fiscal years of annual statements:

- **Fiscal Year 2021:** July 1, 2020 through June 30, 2021
- Fiscal Year 2020: July 1, 2019 through June 30, 2020
- **Fiscal Year 2019:** July 1, 2018 through June 30, 2019

Participation Trends in Fiscal Year 2021

- There were 22,370 direct practice patients, representing 0.29 percent of the state's population of 7.6 million people¹.
- **Increase in patient participation:** Total enrollment increased by 14.3 percent in 2021. Total patients for 2020 were 19,579 while total patients for 2021 were 22,370.
- Enrollment increased by 2,791 participants, or 14.3 percent, from 19,579 participants 2020 to 22,370 in 2021.
- Increase in the number of practices registered: Total registrations increased by nine, from 43 in 2020 to 52 in 2021. Eleven new direct practices registered with the OIC and two direct practices either closed or failed to renew their registration.
- Change to direct practice fees:
 - 12 direct practices reported they did not change their fees.
 - o 10 direct practices reported they decreased fees.
 - o 19 direct practices reported they increased fees.

¹ As reported by the U.S. Census Bureau. Exact population figure: 7,614,893

- The 11 new direct practices have no fee history prior to 2021.
- **Zero complaints received:** The OIC did not receive any complaints about direct practices.

Voluntary data reported by direct practices: While all registered practices responded to the mandatory questions, not all reported voluntary information. Some indicated they do not collect this information, while others simply did not respond to the voluntary questions.

Suggested modification to chapter: The annual survey to direct practices contains mandatory questions and voluntary questions. Historically, providers do not answer the voluntary questions. As a result, it is difficult for the OIC to monitor for compliance with Chapter 48.150 RCW. For example:

- RCW 48.150.020 prohibits discrimination by direct providers. The questions that seek information about discrimination in practices are voluntary and are most often left blank.
- RCW 48.150.050 prohibits direct practices from establishing a direct practice agreement with employers, but the questions directed at ascertaining compliance with this provision are voluntary.

There is no practical method for the OIC to actively monitor direct practices for compliance with Chapter 48.150 RCW. Therefore, the OIC recommends removing the term "voluntary data" from the statute for clarity and requiring direct practices to answer all of the annual survey questions.

Background

In 2007, the Washington State Legislature enacted a law to encourage innovative arrangements between patients and providers and to promote access to medical care for all citizens.

Engrossed Substitute Senate Bill (ESSB) 5958, known as the direct patient-provider primary health care bill and codified as <u>Chapter 48.150 RCW</u>, identified direct practices as "a means of encouraging innovative arrangements between patients and providers and to help provide all citizens with a medical home."

Prior to the passage of this law, health care providers engaged in direct patient practices were subject to state law governing health care service contractors. However, due to the limited nature of the business model, the Office of the Insurance Commissioner (OIC) recognized that imposing the full scope of regulation under this law was not practical for a limited number of providers that wished to offer this model to their patients.

Under the 2007 law, registered direct practices operate within the safe harbor created by RCW 48.150 and are not insurers, health carriers, health care service contractors or health maintenance organizations as defined in RCW Title 48. As such, they operate without having to meet certain responsibilities that are required for insurers, including but not limited to financial solvency, capital maintenance, market conduct, and reserve and filing requirements. As a result, the OIC's regulatory authority over registered direct practices is extremely limited.

During the 2014 regular legislative session, the Legislature passed ESSB 1480. This bill amends RCW 48.150.040 to allow direct practices to dispense an initial supply of generic prescription drugs if the supply does not exceed 30 days and does not involve an additional cost to the patient.

The OIC's regulatory role is registering direct practices and reviewing their annual statements, which the OIC reports annually to the Legislature. The Legislature did not give the OIC specific rulemaking authority over direct practices. However, the OIC has the authority to tell direct practices how to submit the statements, what format to follow and what data to include.

Annual Reports

State law requires direct practices to submit annual statements to the OIC that include:

- The number of providers in each practice.
- The total number of patients.
- The average monthly fee.
- Names of direct practice providers.
- Business addresses.

The OIC's annual report to the Legislature must include:

- Participation trends.
- Complaints the OIC has received.
- Voluntary data reported by direct practices.
- Any modifications to the chapter the OIC recommends.

Definition of Direct Practices in Washington State

Direct patient-provider primary care practices (direct practices) also are sometimes called "retainer" or "concierge" practices. Washington State defines direct practices in RCW 48.150.010 as a provider that:

- Charges a monthly fee for providing primary care services.
- Offers only primary care services.
- Enters into a written agreement with patients describing the services and fees.
- Does not bill insurance for any of the patient's primary care services.

A direct practice is a model of care in which physicians charge a predetermined, fixed monthly fee to patients for all primary care services provided in their offices, regardless of the number of visits or care provided. RCW 48.150.010(8) defines "primary care services" as routine health care services, including screening, assessment, diagnosis, and treatment for the purpose of promotion of health, and detection and management of disease or injury.

Direct practices cannot sell to employer groups.

In 2009, the Legislature made minor modifications to the original legislation. Direct practices may now accept fees paid by an employer on behalf of an employee. However, the law still prohibits employers from entering into coverage agreements with direct practices.

Physicians who provide direct care say their practices serve fewer patients than conventional practices but give patients more time during office visits to ask questions and receive explanations of medical care. Some direct practices offer additional services, such as same-day appointments, extended business hours, home visits and 24-hour emergency physician availability.

Direct practices do not provide comprehensive coverage. Under RCW 48.150.010(4)(d), direct practice services must not include hospitalization, major surgery, dialysis, high-level radiology, rehabilitation services, procedures requiring general anesthesia, more than an initial 30-day supply of prescription drugs or similar advanced procedures, services or supplies. RCW 48.150.110(1) requires direct practice agreements to contain this disclaimer: "This agreement does not provide comprehensive health insurance coverage. It provides only the health care services specifically described."

2021 Direct Practice Information

Direct practices began filing annual statements with the Office of the Insurance Commissioner (OIC) in October 2007. In August 2021, the OIC sent its annual survey to registered practices. This survey collects the mandatory information state law requires and asks additional voluntary questions.

Direct practices file a statement with the OIC to register and then annually submit a statement to continue offering direct practice services. Over the past two years, the OIC has seen an increase in the need to protect consumers from unlawful direct practice agreements during the first filing or initial submission with the OIC. When a direct practice submits its first statement, the OIC reviews direct practice agreements from compliance with Chapter 48.150 RCW, the laws governing direct practices. There has been an increase in improper fees detailed in direct practice contracts, such as cancellation fees and refusing to refund consumers who paid in advance but want to terminate their direct-practice agreement.

More frequently, direct practice agreements fail to include information required by law to fully inform patients. For example, some agreements frequently fail to include a disclaimer statement to inform consumers that a direct practice agreement is not comprehensive coverage. Consumers need to understand that emergency and specialty care must be paid out of pocket or that consumers should purchase a supplemental health plan. RCW 48.150.100 requires direct practice agreements to contain the OIC's contact information to help consumers, however this is rarely included.

Data from the Annual Statements

This report compares data from three fiscal years of annual statements:

• **Fiscal Year 2021:** July 1, 2020 – June 30, 2021

• **Fiscal Year 2020:** July 1, 2019 – June 30, 2020

• Fiscal Year 2019: July 1, 2018 – June 30, 2019

The following chart summarizes data the OIC collected in Fiscal Year 2021.

Information for prior years is available on the OIC's website.

Table 1: Data Summary

Direct Practice Name	County of Operation	# of patients FY 2019	# of patients FY 2020	# of patients FY 2021	Enrollment Change from 2020 to 2021	Monthly fee FY 2019	Monthly fee FY 2020	Monthly fee FY 2021	Fee Change from 2020 to 2021
Anchor Medical Clinic	Island	50	50	63	Increase	\$ 200.00	\$ 200.00	\$ 200.00	No Change

Direct Practice Name	County of Operation	# of patients FY 2019	# of patients FY 2020	# of patients FY 2021	Enrollment Change from 2020 to 2021	Monthly fee FY 2019	Monthly fee FY 2020	Monthly fee FY 2021	Fee Change from 2020 to 2021
Assurance Healthcare & Counseling Center, LLC	Yakima	1507	1842	2045	Increase	\$ 95.00	\$ 70.00	\$ 75.00	Increase
Bellevue Medical Partners PLLC	King	Did not respond in 2019	580	570	Decrease	Did not respond in 2019	\$ 180.00	\$ 185.00	Increase
MD2 Bellevue / Bjurstrom & O'Quin, PLLP	King	202	196	192	Decrease	\$ 1,118.00	\$ 1,172.91	\$ 1,169.27	Decrease
Capitol Hill Medical	King	New report in 2021	New report in 2021	25	NEW	New report in 2021	New report in 2021	\$ 141.00	NEW
Care Medical Associates, PLLC	King	297	292	287	Decrease	\$ 150.00	\$ 129.00	\$ 130.00	Increase
Pacifica Medicine and Wellness / Chymiymatty,LLC	Poulsbo	New report in 2020	160	145	Decrease	New report in 2020	\$ 50.00	\$ 50.00	No Change
Coho Medical Group, PLLC	King	123	151	161	Increase	\$ 79.00	\$ 79.00	\$ 79.00	No Change
Cosmas Primary Care, P.S.	Pierce	67	60	63	Increase	\$ 78.00	\$ 80.00	\$ 85.00	Increase
Day Family Medicine	Kitsap	New report in 2021	New report in 2021	102	NEW	New report in 2021	New report in 2021	\$ 60.00	NEW
Destiny Direct Primary Care and Wellness Center, PLLC	Pierce	New report in 2021	New report in 2021	169	NEW	New report in 2021	New report in 2021	\$ 72.00	NEW
Direct Care Clinics US PC/Delta Direct Care	Clark	1672	500	430	Decrease	\$ 32.00	\$ 60.00	\$ 60.00	No Change
Direct Primary Care	Spokane	New report in 2021	New report in 2021	594	New	New report in 2021	New report in 2021	\$ 55.00	New
Docere Integrated Medicine	King	New report in 2021	New report in 2021	450	New	New report in 2021	New report in 2021	\$ 179.00	New

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Direct Practice Name	County of Operation	# of patients FY 2019	# of patients FY 2020	# of patients FY 2021	Enrollment Change from 2020 to 2021	Monthly fee FY 2019	Monthly fee FY 2020	Monthly fee FY 2021	Fee Change from 2020 to 2021
Edmonds Health Clinic	Snohomish	39	56	52	Decrease	\$ 95.00	\$ 95.00	\$ 95.00	No Change
Elkhorn Valley Corporation/CompassDi rect HealthCare	Kittitas	New report in 2020	1192	1109	Decrease	New report in 2020	\$ 50.00	\$ 57.00	Increase
Equinox Primary Care PLLC	King	New report in 2021	New report in 2021	425	New	New report in 2021	New report in 2021	\$ 75.00	New
Everside Health (formerly Paladina Health) - Federal Way, Puyallip, Tacoma	Pierce	Did not respond in 2019	2100	852	Decrease	Did not respond in 2019	\$ 60.00	\$ 0.00 ²	Decrease
Family and Wellness Medicine LLC	King	6	18	21	Increase	\$ 75.00	\$ 100.00	\$ 100.00	No Change
Family Care Spokane, LLC	Spokane	153	100	67	Decrease	\$ 140.00	\$ 108.31	\$ 75.00	Decrease
Fern Lane Company LLC/Thrive Direct Health Care	Skagit	New report in 2020	220	260	Increase	New report in 2020	\$ 55.00	\$ 60.00	Increase
GoodMed Direct Primary Care	King	327	328	322	Decrease	\$ 60.00	\$ 59.00	\$ 59.59	Increase
Guardian Family Care	Snohomish	189	95	105	Increase	\$ 145.00	\$ 136.50	\$ 102.00	Decrease
Heritage Family Medicine	Thurston	24	29	29	No Change	\$ 55.00	\$ 70.00	\$ 65.52	Decrease
James and Lacambra PLLC/Seattle Premier Health	King	562	650	936	Increase	\$ 235.00	\$ 235.00	\$ 229.00	Decrease
Jared Hendler, MD PLLC	Kitsap	89	88	84	Decrease	\$ 234.00	\$ 235.00	\$ 243.42	Increase

² Ridgefield Family Medicine and Everside Health (Paladina Health) provide care to employer groups, so it is likely the monthly fee of \$0 reflects how much individuals pay, not how much employers pay for their employees' coverage.

Direct Practice Name	County of Operation	# of patients FY 2019	# of patients FY 2020	# of patients FY 2021	Enrollment Change from 2020 to 2021	Monthly fee FY 2019	Monthly fee FY 2020	Monthly fee FY 2021	Fee Change from 2020 to 2021
Lissa Lubinski MD PLLC	Clallam	Did not respond in 2019	222	250	Increase	Did not respond in 2019	\$ 60.00	\$ 75.00	Increase
Main Street Family Medicine PLLC	Clark	New report in 2021	New report in 2021	945	New	New report in 2021	New report in 2021	\$ 55.00	New
Manette Clinic A Professional Service Corporation	Kitsap	790	876	922	Increase	\$ 77.00	\$ 62.00	\$ 86.00	Increase
MB2K, LLC/Family Care of Kent	King	Did not respond in 2019	2	2	No Change	Did not respond in 2019	\$ 60.00	\$ 60.00	No Change
NFB PLLC/Greenlake Primary Care	King	New Report in 2021	New report in 2021	267	New	New report in 2021	New report in 2021	\$ 78.00	New
Nurture Well Center	King	New report in 2021	New report in 2021	90	New	New report in 2021	New report in 2021	\$ 100.00	Decrease
Olympic Medical Services/Vantage Physicians	Thurston	828	839	884	Increase	\$ 128.00	\$ 94.59	\$ 103.00	Increase
Oodle Family Medicine	King	100	130	140	Increase	\$ 45.00	\$ 50.00	\$ 60.00	Increase
Pacific Northwest Wellness Center, PLLC (Formerly RediMedi Clinic)	Douglas	712	1179	1556	Increase	\$ 55.00	\$ 55.00	\$ 59.00	Increase
Pier View Chiropractic, Inc PS	King	Did not respond in 2019	320	185	Decrease	Did not respond in 2019	\$ 219.00	\$ 206.00	Decrease
Affordable Access / Part of Snoqualmie Hospital	King	133	119	74	Decrease	\$ 40.00	\$ 40.00	\$ 40.00	No Change
Quick Clinic/Washington Park Direct Care	Lewis	1290	1387	1486	Increase	\$ 60.00	\$ 60.00	\$ 60.00	No Change
Revive Family Medicine PLLC	Thurston	New report in 2021	New report in 2021	38	New	New report in 2021	New report in 2021	\$ 70.00	New

Direct Practice Name	County of Operation	# of patients FY 2019	# of patients FY 2020	# of patients FY 2021	Enrollment Change from 2020 to 2021	Monthly fee FY 2019	Monthly fee FY 2020	Monthly fee FY 2021	Fee Change from 2020 to 2021
Ridgefield Family Medicine	Clark	Did not respond in 2019	0	0	No Change	Did not respond in 2019	\$ 50.00	\$ 0.00 ³	Decrease
Seattle Medical Associates	King	3093	3136	3430	Increase	\$ 160.00	\$ 153.76	\$ 144.62	Decrease
Sound Clinical Medicine PS	Pierce	9	21	24	Increase	\$ 125.00	\$ 49.00	\$ 50.00	Increase
Sound Medicine and Wellness	King	75	100	150	Increase	\$ 208.00	\$ 200.00	\$ 200.00	No Change
Swedish Ballard Family Medicine	King	50	35	35	No Change	\$ 55.00	\$ 55.00	\$ 55.00	No Change
Total Care Clinics	Benton	46	20	14	Decrease	\$ 60.00	\$ 60.00	\$ 75.00	Increase
transforMD Primary Care	Snohomish	18	43	58	Increase	\$ 70.00	\$ 70.00	\$ 60.00	Decrease
Urgent Medical Center	Clark	10	4	12	Increase	\$ 60.00	\$ 60.00	\$ 60.00	No Change
Vigil Family Medicine, PLLC	Pierce	New report in 2021	New report in 2021	12	New	New report in 2021	New report in 2021	\$ 75.00	New
Vincent Perkinson, PLLC/MD2 Seattle	King	232	242	247	Increase	\$ 1,028.00	\$ 1,032.00	\$ 1,033.06	Increase
Vintage Direct Primary Care	Kitsap	1032	1070	1036	Decrease	\$ 43.00	\$ 52.00	\$ 56.00	Increase
Water's Edge Family Practice & Wellness Center	Island	New report in 2020	234	211	Decrease	New report in 2020	\$ 87.50	\$ 115.20	Increase

³ Ridgefield Family Medicine and Everside Health (Paladina Health) provide care to employer groups, so it is likely the monthly fee of \$0 reflects how much individuals pay, not how much employers pay for their employees' coverage.

Direct Practice Name	County of Operation	# of patients FY 2019	# of patients FY 2020	# of patients FY 2021	Enrollment Change from 2020 to 2021	Monthly fee FY 2019	Monthly fee FY 2020	Monthly fee FY 2021	Fee Change from 2020 to 2021
Wise Patient Internal Medicine, PLLC	King	261	712 or 363	744	Increase	\$ 100.00	\$ 100.00	\$ 125.00	Increase
Peace Health Medical Group	Clark	29	28	CLOSED	Increase	\$ 100.00	\$ 95.00	CLOSED	NA
Lacamas Medical Group	Clark	117	160	DID NOT RESPOND	Increase	\$ 60.00	\$ 80.00	DID NOT RESPOND	NA
Total number of patients in all direct practices		14,482	19,579	22,370					

Locations

In 2021, 52 direct practices submitted an annual statement.

- In 2021, 11 direct practices began reporting to the OIC:
 - Capitol Hill Medical
 - Day Family Medicine
 - Destiny Direct Primary Care and Wellness Center, PLLC
 - Direct Primary Care
 - Docere Integrated Medicine
 - Equinox Primary Care PLLC
 - Main Street Family Medicine PLLC
 - o NFB PLLC/Greenlake Primary Care
 - Nurture Well Center
 - o Revive Family Medicine
 - o Vigil Family Medicine, PLLC
- Two clinics reported they no longer provide direct practice services or did not submit their annual statement to renew their registration with the OIC:
 - Peace Health Medical Group
 - Lacamas Medical Group

Direct practices operate in 16 counties.

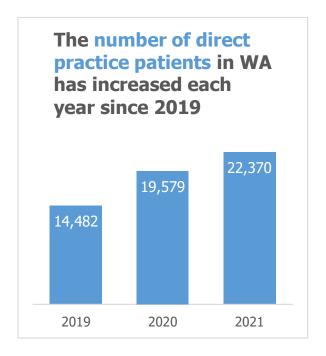
County	Direct Practice City
Benton	Total Care Clinics – Kennewick
Clallam	Lissa Lubinski MD – Port Angeles
Clark	 Delta Direct Care – Battleground Lacamas Medical Group – Camas
	 Main Street Family Medicine PLLC – Vancouver PeaceHealth Medical Group – Vancouver
	Ridgefield Family Medicine – Ridgefield
Douglas	 Urgent Medical Center – Vancouver Pacific Northwest Wellness Center, PLLC (formerly RediMedi Clinic) – Wenatchee
Island	 Anchor Medical Clinic – Freeland Water's Edge Family Practice and Wellness Center – Langley
King	 Affordable Access (Snoqualmie Valley Hospital) – Snoqualmie Bellevue Medical Partners – Bellevue Capitol Hill Medical – Seattle Care Medical Associates – Bellevue Coho Medical Group – Bellevue Docere Integrated Medicine – Auburn Equinox Primary Care PLLC – Seattle Family and Wellness Medicine – Federal Way Family Care of Kent – Kent GoodMed Direct Primary Care – Seattle Greenlake Primary Care – Seattle MD² – Bellevue MD² – Seattle Nurture Well Center – Shoreline
	 Oodle Family Medicine – Renton Pier View Chiropractic – Normandy Park Seattle Medical Associates – Seattle
	Seattle Premier Health – Seattle

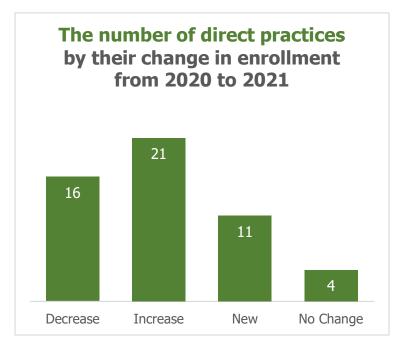
County	Direct Practice City
	Sound Medicine and Wellness – Seattle
	 Swedish Ballard Family Medicine Clinic – Ballard
	Wise Patient Internal Medicine – Seattle
Kitsap	Day Family Medicine – Poulsbo
	 Jared Hendler, MD – Bainbridge Island
	The Manette Clinic – Bremerton
	 Pacifica Medicine and Wellness – Poulsbo
	 Vintage Direct Primary Care – Poulsbo
Kittitas	Elkhorn Valley Corporation/CompassDirect HealthCare
Lewis	Quick Clinic/Washington Park Direct Care – Centralia
Pierce	Cosmas Primary Care, P.S. – Tacoma
	 Destiny Direct Primary Care and Wellness Center, PLLC
	 Everside Health (Paladina Health) – Federal Way, Puyallup and Tacoma
	 Sound Clinical Medicine, P.S. – Gig Harbor
	 Vigil Family Medicine, PLLC – Tacoma
Skagit	Fern Lane Company LLC/Thrive Direct Health Care – La Conner
Snohomish	Edmonds Health Clinic – Edmonds
	Guardian Family Care – Mill Creek
	 TransforMD Primary Care – Lynnwood
Spokane	Direct Primary Care - Spokane
	 Family Care of Spokane – Spokane
Thurston	Heritage Family Medicine – Olympia
	Olympic Medical Services/Vantage Physicians – Olympia
Yakima	Assurance Healthcare & Counseling Center – Yakima

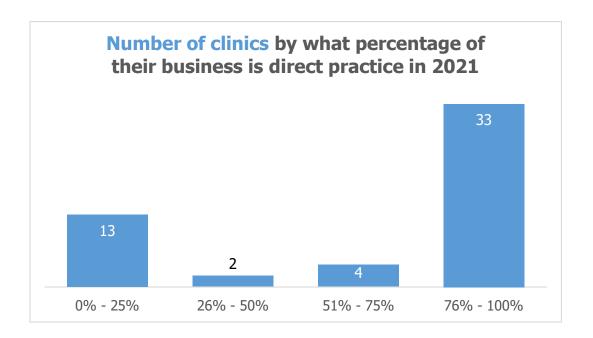
Enrollment During Fiscal Year 2021

- Enrollment **increased** at 21 direct practice clinics by 1,580 new patients, a 14.3% increase. New patients ranged from three to 377 people.
 - o Total patients for 2020: 19,579

- o Total patients for 2021: 22,370.
- The largest number of new enrollees: Pacific Northwest Wellness Center, PLLC (formerly RediMedi Clinic) with 377 new patients, a 34% increase. Its enrollment grew from 1,179 in 2020 to 1,556 in 2021.
 - This clinic also had the largest increase in patients last year, at 39.6%. Its enrollment grew from 712 patients in 2019 to 1,179 patients in 2020.
 - The smallest number of new patients was three at Family and Wellness Medicine, LLC, Cosmas Primary Care, P.S., and Sound Clinical Medicine, PS.
- Enrollment **decreased** at 16 clinics, with a combined decrease of 1,725 enrollees, or 8.81 percent of enrollees in 2020.
 - Everside Health reported a decrease of 1,248 direct practice enrollees, which it attributed to closing one clinic in Vancouver, Washington.
- Four direct practices reported no change in enrollment.
- Seventeen direct practices voluntarily reported that they participate as in-network providers in a health carrier's network in 2021. This is a significant change since reporting began in 2007, when all practices reported direct-patient provider primary care exclusively.
- All 52 practices voluntarily reported the percentage of their business that is direct practice.
 - o Nine practices reported that 5 percent or less of their business is direct practice.
 - o 24 direct practices reported that 100 percent of their business is direct practice.

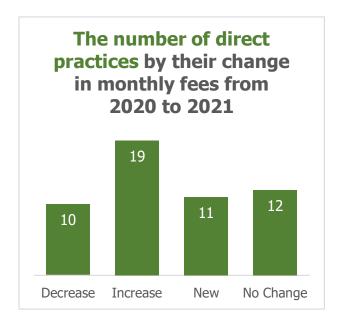






Fees in Fiscal Year 2021

- 19 direct practices **increased** their monthly fees.
 - o 12 practices increased their fees by \$5.00 or more per month.
 - The average increase of monthly fees was \$9.06.
 - Water's Edge Family Practice & Wellness Center had the highest monthly fee increase of \$27.70.
- 10 direct practices **decreased** their monthly fees.
 - o The average decrease in monthly fees was \$22.41.
- 12 direct practices saw **no change** in their monthly fees.
 - The average monthly fee at these practices was \$88.25.
- The average monthly fee decreased from \$142 in 2020 to \$130.82 in 2021.
- The average monthly fee for all new direct practices is \$85.00.
- The highest monthly fee is \$1,169.27 at Bjurstrom & O'Quin, PLLP/MD² Bellevue.
- The lowest monthly fee is \$0 at Ridgefield Family Medicine and Everside Health, both of which contract with employer groups.
 - The monthly fee of \$0 reflects how much individuals pay, not how much employers pay to the direct practice.
- The next lowest monthly fee is \$40 at Affordable Access/Public Hospital District No. 4 in King County.







Affordability of Direct Practices

A key assumption underlying the 2007 legislation was that direct practices could provide affordable access to primary care services. In theory, this would reduce pressure on the health care system and relieve problems caused by a shortage of primary care physicians.

Monthly fees at direct practices vary from 0 dollars (40 dollars not counting practices that only provide care to employer groups) to 1,169.27 dollars.

- Enrollees at nine practices pay \$100 \$200 per month.
- Enrollees at 36 practices pay \$100 or less per month.
- Enrollees at five practices pay more than \$200 per month.

The OIC does not collect data regarding the affordability of the fees for direct practice patients.

Table 2: Changes in practice census over time, based on monthly fee

Monthly fee	<u>\$ 50 or less</u>	<u>\$51 \$75</u>	<u>\$76 \$100</u>	<u>\$101 \$200</u>	<u>\$201 +</u>
FY 2021 enrollees	1,095	11,136	1,576	6,919	1,644
FY 2021 practices	5	24	7	11	5
FY 2020 enrollees	1,622	9,357	1,909	4,353	1,838
FY 2020 practices	6	15	9	7	5
FY 2019 enrollees	2,917	2,600	2,816	4,969	1,160
FY 2019 practices	4	10	7	8	5
FY 2018 enrollees	4,574	6,668	1347	4,585	532
FY 2018 practices	4	17	7	5	3
FY 2017 enrollees	2,556	5,336	1,348	4,554	996
FY 2017 practices	6	18	7	5	3
FY 2016 enrollees	1511	2581	2167	4151	862
FY 2016 practices	8	8	6	6	2
FY 2015 enrollees	1519	2651	2737	3757	840
FY 2015 practices	10	10	6	6	3

Direct Practices and the Insurance Market

The OIC annual survey asks direct practice clinics if they collect information about patients' other health plans when they enroll. In 2021, 35 of the 44 responding direct practices indicated they collect this information.

According to the clinics that reported this voluntary information, the number of direct practice clients who are uninsured are:

- **Fiscal Year 2021:** 2,364 enrollees, or 10.57 percent.
- **Fiscal Year 2020:** 1693 enrollees, or 1.7 percent.
- **Fiscal Year 2019:** 599 enrollees, or 4.1 percent.

Under Washington state law, direct practices cannot bill insurers for primary care services provided under the direct practice agreement because this would result in "double dipping" or collecting payment twice.

Patients are advised to obtain other insurance such as a high-deductible health plan, also called "catastrophic plans," to pay for emergency and other services not covered by direct practices.

The number of direct practice clients who have private insurance (non-Medicare, non-Medicaid) are:

- **Fiscal Year 2021:** 32 direct practices reported 8,642 enrollees had private insurance, or 38.6 percent of all enrollees.
- **Fiscal Year 2020:** 30 direct practices reported 10,005 enrollees had private insurance, or 51.1 percent of all enrollees.
- **Fiscal Year 2019:** 17 direct practices reported 3,626 enrollees had private insurance, or 25.0 percent of all enrollees.

Medicare enrollment:

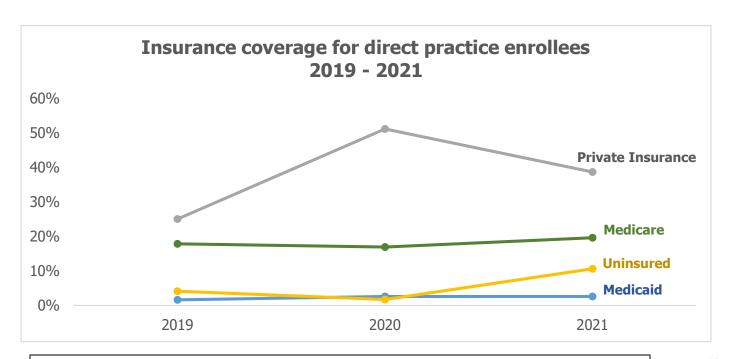
22 direct practices reported Medicare enrollment figures for 2021.

- **Fiscal Year 2021:** 4,374 enrollees or 19.6 percent.
- **Fiscal Year 2020:** 3,314 enrollees or 16.9 percent.
- **Fiscal Year 2019:** 2,578 enrollees or 17.8 percent.

Medicaid enrollment:

21 direct practices reported Medicaid enrollment figures for 2021.

- **Fiscal Year 2021:** 589 enrollees or 2.6 percent.
- **Fiscal Year 2020:** 516 enrollees or 2.6 percent.
- **Fiscal Year 2019:** 234 enrollees or 1.6 percent.



How Direct Practices Evolved

Washington State is the birthplace of direct practices. The origins of this approach are often traced to MD², a practice that began in 1996.

Since 1996:

- The American Medical Association and the American Academy of Family Physicians established ethical and practice guidelines for direct practices.
- In 2003, the federal establishment of Health Savings Accounts (HSA) promoted consumer-directed medicine, which includes direct practices.
- In 2003, the Society for Innovative Medical Practice Design formed and represents direct practice physicians. Its initial name was the American Society of Concierge Physicians.
- In 2004, the federal Office of the Inspector General for the Department of Health and Human Services warned practices about "double dipping," and began taking enforcement steps against physicians who charged Medicare beneficiaries extra fees for already covered services, such as coordination of care with other health care provider, preventative services and annual screening tests. The practices were referred to under various names: concierge, retainer or platinum practices.
- In 2005, the U.S. Government Accountability Office issued <u>GAO Report 05-929</u>⁴, called "Physician Services: Concierge Care Characteristics and Considerations for Medicare." At the time, there were 112 "concierge physicians" nationwide who charged annual fees ranging from 60 to 15,000 dollars.
- In 2006, Washington State's insurance commissioner determined that retainer practices are insurance. West Virginia's commissioner made the same ruling in 2006.
- In 2007, Washington became the first state to define and regulate direct patient primary care practices and to prohibit direct practice providers from billing insurance companies for services provided to patients under direct practice agreements.

Federal Health Care Reform

On March 23, 2010, President Obama signed The Patient Protection and Affordable Care Act, commonly referred to as the Affordable Care Act (ACA). It required the development of health benefit exchanges, beginning in 2015, to help individuals and small businesses purchase health insurance and qualify for subsidies that are available only for plans that are sold through an exchange.

Under the ACA, an exchange may only offer qualified health plans and each plan must meet requirement standards and provide an essential benefit package. Essential health benefits include:

Ambulatory patient services.

⁴ Link to GAO report: http://www.gao.gov/assets/250/247393.pdf

- Emergency services.
- Hospitalization.
- Maternity and newborn care.
- Mental health and substance use disorder services, including behavioral health treatment.
- Prescription drugs.
- Rehabilitative and habilitative services and devices.
- Laboratory services.
- Preventive and wellness services and chronic disease management.
- Pediatric services, including dental and vision care.

Since September 23, 2010, the ACA has required new health plans to eliminate cost-sharing requirements for evidence-based items or services that have an "A" or "B" rating from the United States Preventive Services Task Force.

Washington State's Exchange Legislation

In 2013, the Washington Legislature passed E2SHB 2319, "An act relating to furthering state implementation of the health benefit exchange and related provisions of the affordable care act." This is called "The Exchange Bill."

Section 8(3) of the bill, now codified as RCW 43.71.065(3), allows the Exchange Board to permit direct primary care medical home plans, consistent with section 1301 of the ACA, to be offered in the Exchange beginning on January 1, 2015.

Section 1301(a)(3) TREATMENT OF QUALIFIED DIRECT PRIMARY CARE MEDICAL HOME PLANS.

The Secretary of Health and Human Services shall permit a qualified health plan to provide coverage through a qualified direct primary care medical home plan that meets the criteria established by the Secretary, so long as the qualified health plan meets all requirements that are otherwise applicable and the services covered by the medical home plan are coordinated with the entity offering the qualified health plan.

The Future of Direct Practices

The development of the ACA raises questions. Although we can't know or anticipate all issues that may arise in the future, below are a few of the most frequently asked questions.

How do direct practices operate under the ACA?

Direct practices are not insurers and are only authorized to offer primary care services to their direct practice patients. Direct practices are not able to provide comprehensive health care. Therefore, under the ACA, they are not qualified health plans eligible for sale through the Exchange.

The ACA specifies that a "qualified health plan" may provide coverage "through a qualified direct primary care medical home plan." As a result, a direct practice may contract with a carrier to provide primary care services in a carrier's qualified health plans in addition to offering direct practice services to patients, but cannot bill an insurance carrier for services rendered under a direct practice agreement.

How does the ACA affect consumers who have existing direct practice agreements?

The individual mandate responsibility provision of the ACA requires consumers to purchase health insurance that provides for the essential health benefits and will cover emergency services. Direct practice agreements only provide primary care services and do not cover emergency services. As such, they do not qualify as health insurance, so they do not meet the individual mandate requirement, although this mandate is not enforced by the current administration.

The Washington Health Benefit Exchange (Exchange) opened in late 2014 and began selling policies that were effective starting January 1, 2015. Enrollment both inside and outside of the Exchange for the individual market showed a dramatic increase, with approximately 51,000 more health insurance enrollees in 2016 than in 2014.

Consumers who purchase health plans through the Exchange receive numerous benefits:

- If they meet income requirements, they're eligible for subsidies or premium tax credits, which are not available outside of the Exchange. It's possible that consumers who receive these financial incentives might cancel their direct practice agreements.
- Exchange health plans cover essential health benefits (EHBs), including but not limited to
 preventive services and chronic disease management. If a consumer pays a direct practice instead
 of obtaining a health plan that covers EHBs, the consumer would only receive primary care,
 preventive services and chronic disease management services. Direct practices do not provide
 access to specialists or emergency care and the consumer have to pay out-of-pocket for other
 medical services, including emergency or specialist services, unless they also obtain health
 insurance.

• If a consumer has health insurance, there are limitations on the maximum out-of-pocket expenses. A maximum out-of-pocket expense is the total amount of the plan's annual deductible and other annual out-of-pocket expenses other than premiums that the insured is required to pay, such as copayments and coinsurance. Once that limit is reached, a consumer does not pay for co-insurance expenses, such as co-payments. However, consumers' costs associated with a direct practice will not count as cost-sharing expenses under most health plans and will not be applied to reduce the maximum out of pocket limitation because those services are not received as a part of a health plan benefit. For example, a direct practice provider is not a network provider and cannot bill health carriers regulated under chapter 48 RCW for health care services because those services are being paid by the consumer through the direct practice agreement and would result in double payment. Therefore, the consumer does not benefit from direct practice monthly fees counting toward annual maximum out-of-pocket expense limits.

Does federal health care reform bar direct practice arrangements from operating outside the Exchange?

Nothing in federal health care reform bars direct practice arrangements from operating outside the Exchange. There appears to still be a market for exclusive direct practices that cater to wealthier consumers and offer a concierge model, as well as for consumers who can't buy health care coverage on the Exchange, such as undocumented immigrants. In addition, some consumers simply join direct practices because they like the personal service, so these consumers may still continue to use direct practices.

Recommendations for Legislative Modifications

Washington State is at the forefront of national regulation of direct primary care practices. Although direct primary care practices have not gained significant market share, they are present in 16 counties in Washington.

The annual survey contains mandatory questions that providers are required to answer under the requirements of the bill and voluntary questions providers that providers are not required to answer. Historically, the providers do not answer the voluntary questions. As a result, it is difficult for the OIC to monitor for compliance with Chapter 48.150 RCW without the relevant information concerning the practices. For example:

- RCW 48.150.020 prohibits discrimination by direct providers. However, the questions that seek
 information about the possibility of discrimination in practices are voluntary and are most often left
 blank.
- Additionally, RCW 48.150.050 prohibits direct practices from establishing a direct practice
 agreement with employers, but the questions directed at ascertaining compliance with this
 provision are voluntary.

RCW. Therefore, the Insurance Commissioner recommends removing the term "voluntary data" from the statute for clarity and requiring direct practices to answer all of the annual survey questions.				

There is no practical means for the OIC to monitor direct practices for compliance with Chapter 48.150

APPENDIX A: Annual Statement Form

(*Asterisk indicates voluntary information)

This year, like last year, the OIC collected annual survey responses through an online form to make the process easier for providers and to receive timely responses. The questions were similar to paper statements issued in previous years. A summary of the questions are provided below.

1.	registered).	e all names utilized, such as a DBA name, so that all names can be listed as
	Practice Name	
	DBA Name	
2.	If the practice utilizes the practice will be lis	more than one name, please identify which name should be the primary name that
	Primary Name	ted direct.
3.	Contact person for th	is statement:
	Name	
	Title	
	Email Address	
	Phone Number	
4.	Will this contact person	on also be the person to contact when it is time to renew the registration? If not, erson.
	Name	
	Title	
	Email Address	
	Phone Number	

5. What is the practice's address?

	Name		
	Company		
	Address		
	City/Town		
	State/Province	- select state	
	ZIP/Postal Code		
	Country		
	Email Address		
	Phone Number		
6.		e is another practice location other than the primary location, please identify to practices are not registered separately.	:he
	Company		
	Address		
	City/Town		
	State/Province	- select state	
	ZIP/Postal Code		
	Country		
	Email Address		
	Phone Number		
7.	Identify all of the pro	viders in your practice who provide direct practice care:	
	Provider 1:		
	Provider 2:		
	Provider 3:		
	Provider 4:		

3.	Identify all affiliated	or partner direct care providers if you are part of a group of dir	ect care providers:
	1:		
	2:		
	3:		
	4:		
9.	What is the total nun	mber of patients currently enrolled in your direct practice?	
10.	. What is the average	monthly membership fee?	
11.	Does the practice off Yes No	fer an annual membership?	
		ype annual membership fee rate, please describe the different fee levels and h	iow
12.	. What is the average	annual membership fee?	
13.	. If the annual membe a trust account? Yes	ership funds are collected in advance for the year, has the practi	ce established set up
	No		

complaints?	
Name	
Company	
Email Address	
Phone Number	
15. Is the practice providi practice? Yes No	ng any care to groups of people, such as employer groups as a part of the direct
If Yes, Please describe:	
16. Has the practice disco	entinued any patients?*
YES / NO	
A. If YES, how many patients has the direct practice discontinued?	
B. If YES, what was/were the reasons for the discontinuation(s)?	
17. Has the practice decli	ned to accept any patients?*
YES / NO	
If Yes, how many patient did the practice decline to accept?	
If Yes, please specify the reason for declining to accept that patients:	
18. Do any of your clinic's network?* Yes	s direct practice providers participate as an in-network provider in a health carrier's

14. What is the name and contact information of the person designated to receive and address any patient

	No		
19.	What percentage of	the practice's business is direct practice?*	
20.	What is the direct pro	actice's website address:	
21.	When a new patient health coverage the	signs a direct practice agreement, does your clinic collect informati patient may have?*	ion about other
	No		
22.	If you answered yes	to question above, how many of your direct practice patients:*	
	Have Medicaid		
	Have Medicare		
	Have private health Insurance		
	Are uninsured		
	Another form of health Care coverage		

26. Please upload the latest copy of your direct practice agreement, including fee structure, disclosure statement and all marketing materials to the correctly corresponding upload link

APPENDIX B: Direct practices' Websites and Addresses

Direct practice name	Address	Website
Anchor Medical Clinic	1412 CASTLEWOOD CT Freeland, WA	www.anchormedicalclinic.com
Assurance Healthcare & Counseling Center, LLC	3611 River Road, Suite 200 Yakima, WA 98902	www.assurancehealth.org
Bellevue Medical Partners, PLLC	11711 NE 12th Street, Suite 2-B Bellevue, WA 98005	www.bellevuemedicalpartners.com
Bjurstrom & O'Quin, PLLP/MD2 Bellevue	1231 116th Avenue NE, Suite 700 Bellevue, WA 98004	www.md2.com
Capitol Hill Medical	901 Boren Avenue, Suite 705 Seattle, WA 98104	www.capitolhillmedical.com
Care Medical Associates, PLLC	1407 116th Avenue NE, Suite 102 Bellevue, WA 98004	www.cmadoc.com
Chymiymatty,LLC/Pacifica Medicine and Wellness	10th Avenue NE, Suite 202 Poulsbo, WA 98370	www.pacificamedicine.com
Coho Medical Group, PLLC	1515 116th Avenue NE, Suite 201 Bellevue, WA 98004	www.cohomedical.com
Cosmas Primary Care, P.S.	2115 S. 56th Street, Suite 103 Tacoma, WA 98409	www.cosmasprimarycare.com
Day Family Medicine	20696 Bond Road NE, Suite 200 Poulsbo, WA	www.dayfamilymedicine.com
Destiny Direct Primary Care and Wellness Center, PLLC	7328 44th Street W, Unit A University Place, WA 98466	www.destinydirect.net
Direct Care Clinics US PC	2370 E 3rd Loop, Suite 203 Vancouver, WA 98661	www.deltadirectcare.com
Direct Primary Care	212 E Central Avenue, Suite 360 Spokane, WA 99208	www.mydpcclinic.com
Docere Integrated Medicine	4329 A Street Southeast, Suite F Auburn, WA 98002	www.docereim.com
Edmonds Health Clinic	221 4th Avenue North Edmonds, WA 98020	www.edmondshealthclinic.com

Direct practice name	Address	Website
Elkhorn Valley Corporation/Compass Direct Healthcare	107 E Mountain View Avenue Ellensburg, WA 98926	www.compassdirecthealthcare.com
Equinox Primary Care, PLLC	2200 6th Avenue, Suite 102 Seattle, WA 98121	www.equinoxprimarycare.com
Everside Health	32275 32nd Avenue S Auburn, WA 98001	www.eversidehealth.com
Family and Wellness Medicine, LLC	34004 16th Avenue S, Suite 100 Federal Way, WA 98003	www.fwmwa.com
Family Care Spokane, LLC/Excelsior Wellness	9631 N Nevada Street Spokane, WA	www.excelsiorwellness.org
Fern Lane Company, LLC/Thrive Direct Healthcare	708 E Morris Street, Suite B La Conner, WA 98257	www.thrivedirecthealthcare.com
GoodMed Direct Primary Care	6553 California Avenue SW, Suite A Seattle, WA 98136	www.goodmedclinic.com
Guardian Family Care	7500 212th Street SW, Suite 201 Edmonds, WA 98026	guardian family care
Heritage Family Medicine	4001 Harrison Avenue NW, Suite 101 Olympia, WA 98532	www.heritagefamilymedicine.com
James and Lacambra PLLC/Seattle Premier Health	1600 E Jefferson Street, Suite 115 Seattle, WA 98122	www.seattlepremierhealth.com
Jared Hendler, MD PLLC	231 Madison Avenue S Bainbridge Island, WA 98110	www.hendlermd.com/direct-care
Lissa Lubinski, MD PLLC	816 E 8th Street Port Angeles, WA 98362	www.lissalubinskimd.com
Main Street Family Medicine, PLLC	6000 NE 88th Street, Suite D-102 Vancouver, WA 98665	www.mainstreetfamilymed.com
The Manette Clinic	1100 Wheaton Way, Suite F & G Bremerton, WA 98310	www.themanetteclinic.com
MB2K, LLC/FamilyCare of Kent	10024 SE 240th Street, Suite 201 Kent, WA 98031	www.familycareofkent.com
NFB PLLC/Greenlake Primary Care	6800 E Green Lake Way N, Suite 200 Seattle, WA 98115	www.greenlakeprimarycare.com
Nurture Well Center	1207 North 200th Street, Suite102 Shoreline, WA 98133	www.nurturewellcenter.com
Olympic Medical Services/Vantage Physicians	3703 Ensign Road. NE, Suite 10-A Olympia, WA 98506	www.vantagephysicians.net

Direct practice name	Address	Website
Oodle Family Medicine	401 Olympia Ave NE Suite 305-MB48 Renton, WA 98056	www.oodlemd.com
Pacific Northwest Wellness Center, PLLC	230 Grant Road, Suite B-2 East Wenatchee, WA 98802	www.theredimediclinic.com
Pier View Chiropractic, Inc PS	19987 1st Avenue S, Suite 103 Seattle, WA 98148	www.pierviewchiropractic.com
Public Hospital District No 4, King County/Snoqualmie Hospital	35020 SE Kinsey Street Snoqualmie, WA 98065	www.snoqualmiehospital.org
Quick Clinic/Washington Park Direct Care	2526 Colonial Drive Centralia, WA 98531	www.washingtonpark.md
Revive Family Medicine, PLLC	106 Plaza Drive, Building C1 Yelm, WA 98597	www.revivefamilymedicine.com
Ridgefield Family Medicine	8507 South 5th Street, Suite 113 Ridgefield, WA 98642	www.ridgefieldfmailymedicine.com
Seattle Medical Associates	1124 Columbia Street, Suite 620 Seattle, WA 98104	www.seattlemedicalassociates.com
Sound Clinical Medicine PS	6718 144th Street NW Gig Harbor, WA 98332	www.soundclinicalmedicine.com
Sound Medicine and Wellness	3216 NE 45thTH Place, Suite 213 Seattle, WA 98105	www.soundmedicineandwellness.com
Swedish Ballard Family Medicine	1801 NW Market Street, Suite 403 Seattle, WA 98107	www.swedish.org
Total Care Clinics	1776 Fowler Street Richland, WA 99352	www.totalcaretricities.com
TransforMD Primary Care	1133 164th Street, SW, Suite 206 Lynnwood, WA 98087	www.transformdpc.com
Urgent Medical Center	9430 NE Vancouver Mall Drive Vancouver, WA 98622	evermeddpc.com
Vigil Family Medicine, PLLC	1901 S. Union Avenue, Suite 4003 Tacoma, WA 98405	www.vigilmd.com
Vincent Perkinson, PLLC/MD2 Seattle	1101 Madison Street, Suite 1501 Seattle, WA 98104	www.md2.com
Vintage Direct Primary Care	19319 7th Avenue NE, Suite 114 Poulsbo, WA 98370	www.vintagedpc.com
Water's Edge Family Practice & Wellness Center	221 2nd Street, Suite 6A Langley, WA 98260	www.watersedgewellnesscenter.com

Direct practice name	Address	Website
Wise Patient Internal	613 19th Avenue E, Suite 201	www.imwisepatient.com
Medicine, PLLC	Seattle, WA 98112	www.imwisepatient.com

APPENDIX C: Voluntary Information Statistics

Practice Name	Has the practice discontinued any patients within the past year?	Has the practice declined any	Do any of your clinics' direct practice providers as an in network provider in a health carrier's network?	What percentage of the practice's business is direct practice?	Does your clinic collect information about other health coverage the patient may have?	Number of patients who have	Number of patients who have	Number of patients who have private health	Number of patients who are	Number of patients with another form of health care
Anchor Medical Clinic	Yes	Yes	No	100%	Yes	4	57	2	0	0
Assurance Healthcare & Counseling Center, LLC	Yes	ON.	O N	100%	ON ON	NA	NA	AN	NA	A
Bellevue Medical Partners PLLC	No	No	No	100%	Yes	1	345	215	8	9
Bjurstrom & O'Quin, PLLP	No	Yes	ON	100%	ON	NA	NA	NA	NA	NA
Capitol Hill Medical	Yes	No	Yes	1%	Yes	10	0	10	5	NA
Care Medical Associates, PLLC	No	No	o N	%08	Yes	0	25	65	0	10
Chymiymatty, LLC	Yes	No	Yes	%9	Yes	0	0	5	137	3
Coho Medical Group, PLLC	No	No	Yes	40%	Yes	7	18	98	38	0

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10	1	57	NA	5	NA	13	NA	NA	9	0	NA	NA	0	0	0	0	0	0
20	714	236	NA	NA	NA	97	30	NA	63	64	250	NA	3	0	0	0	35	10
132	700	386	1	282	NA	433	30	NA	87	10	1050	NA	9	3430	24	06	0	4
28	7	662	NA	0	NA	271	10	NA	11	0	450	NA	0	1640	0	09	0	0
10	7	120	NA	0	NA	70	30	NA	18	0	75	NA	0	0	0	2	0	0
Yes	Yes	Yes	Yes	Yes	No	Yes	Yes	o Z	Yes	Yes	Yes	No	Yes	Yes	Yes	Yes	Yes	Yes
%68	100%	%02	1%	%09	100%	100%	100%	%06	%92	1%	75%	%08	2%	100%	%0	100%	2%	%0
o _N	No	Yes	Yes		No		No	o Z	ON	Yes	0 0 0		Yes	No	Yes	No	Yes	Yes
No No	Yes	No	No	No	Yes	No	No	o N	Yes	No	Yes	No	No	No	No	No	No	No
No	Yes	Yes	No	Yes	No	Yes	No	Yes	No	Yes	Yes	No No	No	No	No	Yes	No	No
Lissa Lubinski MD,	Main Street Family Medicine, PLLC	Manette Clinic A Professional Service	MB2K, LLC	NFB, PLLC	Nurture Well Center	Olympic Medical Services	Oodle Family Redicine	Pacific Northwest Wellness Center,	Pier View Chiropractic, Inc, PS	Public Hospital District No 4, King County	Quick Clinic	Revive Family Medicine, PLLC	Ridgefield Family I Medicine	Seattle Medical Associates	Sound Clinical Medicine, PS	Sound Medicine and Wellness	Swedish Ballard Family Medicine	

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transforMD Primary Care	No	No	No	100%	No	NA	NA	NA	NA	NA
Urgent Medical Center	No	No	Yes	2%	No	NA	NA	NA	NA	NA
Vigil Family Medicine, PLLC	No	No	No	100%	No	NA	NA	NA	NA	NA
Vincent Perkinson, PLLC	No	Yes	No	100%	No	NA	NA	NA	NA	NA
Vintage Direct Primary Care	No	No	No	100%	Yes	06	200	365	235	146
Water's Edge Family Practice & Wellness Center	Yes	Yes	ON O	100%	ON O	NA	NA	NA	NA	NA
Wise Patient Internal Medicine, PLLC	Yes	No	Yes	20%	Yes	28	0	330	14	NA