EvergreenHealth

June 17, 2016

Jim Freeburg,
Washington State Office of the Insurance Commissioner
PO Box 40255
Olympia, WA 98504-0255

Re: Comments Regarding Prior Authorization Requests

Dear Mr. Freeburg,

On behalf of EvergreenHealth I want to thank you for the opportunity to provide comments regarding potential rulemaking on the prior authorization process in the state. This is an important topic that has a significant impact on our operations.

The comments submitted by the Washington State Hospital Association in its June 8, 2016 letter are consistent with the challenges EvergreenHealth experiences with the prior authorization process, and we agree with their assessment of the opportunities for improvement.

We are pleased that you will consider rulemaking that will require transparency, enhance communication and timeliness as well as medical necessity for new requirements. In addition to the comments by WSHA, we ask for consideration of rulemaking that would allow providers to revise an authorization in situations when it is necessary to alter a plan of treatment once a procedure has begun.

For example, a physician scheduled and obtained authorization for CPT code 29827, Arthroscopy, shoulder, surgical; with rotator cuff repair. Once underway the procedure was changed to 29828, Arthroscopy, shoulder, surgical; biceps tenodesis. Both procedures are related to the same condition and pay the same amount; however, the payer would not allow authorization for payment on appeal.

Again, we appreciate the opportunity to provide these comments and our support of the WSHA letter. If you have any questions, please contact me at rcgould@evergreenhealth.com or (425) 899-1670.

Sincerely,

Richard Gould
Director, Revenue Cycle
EvergreenHealth