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Comments from ARNPs United of Washington State

Regarding: **Matter No. R 2016-19 regarding prior authorization processes and transparency**

ARNPs United of Washington State representing over 6,000 advanced registered nurse practitioners supports the efforts of the Office of the Insurance Commissioner (OIC) to adopt rules regulating the processes of prior authorization and transparency. We appreciate the opportunity to provide comments on the proposed rules.

When patients need medication refills and are well managed and stable, undue risk and delay is posed by the current prior authorization process. The proposed rules streamline and define the process, which will reduce delays and prevent the risk of a lapse in treatment.

We request the following amendment to the proposed rules. The addition is underlined and in bold font. "Expedited prior authorization request" means any request for approval of care or treatment where the passage of time could seriously jeopardize the life or health of the patient, seriously jeopardize the patient's ability to regain maximum function, or, in the opinion of a physician **or advanced registered nurse practitioner** with knowledge of the patient's medical condition, would subject the patient to severe pain that cannot be adequately managed without the care or treatment that is the subject of the request.

Over 6000 advanced registered nurse practitioners provide primary and specialty care in independent and group practices across Washington. The need for expedited decision applies to patients seen by all authorized prescribing health professionals. Specifying only a physician is eligible to make this determination could cause delay and potential risk to patients. We urge the Office of the Insurance Commissioner to amend the rule to include advanced registered nurse practitioners.

We support the OIC proposed rules with the above-mentioned amendment and urge its adoption.

Thank you for the opportunity to submit comments.