



August 16, 2016

Jim Freeburg  
Special Assistant to the Insurance Commissioner  
Office of the Insurance Commissioner

Via email: [rulescoordinator@oic.wa.gov](mailto:rulescoordinator@oic.wa.gov)

Dear Jim:

On behalf of the Washington Speech-Language-Hearing Association (WSLHA), I am providing comments on the July stakeholder draft rules regarding prior authorization.

WSLHA appreciates that this draft incorporates many of our comments from our previous comment letter. In that letter, WSLHA commented that timeliness is a key barrier to access to care. We appreciate the very specific timelines laid out in the rule.

We appreciate that the rule only allows an issuer to ask for pertinent medical information, not an entire medical record, for prior authorization decisions. This can be an enormous burden on our members, taking energy away from patient care. We also appreciate that procedure codes are not required in a prior authorization request.

WSLHA commented that appropriate credentialed clinicians should be used to make prior authorization decisions and that the provider requesting prior authorization know the credentials of the person making the decision. We appreciate that this is included in the rule.

Finally, WSLHA supports the language in the rule establishing that the insurer is responsible for any decision made by the insurer's contractor. Ultimately, the insurer is regulated by the OIC and must be accountable for their contractor's decisions.

We ask that the OIC change the language regarding the definition of prior authorization. The draft rules define prior authorization as a request before any treatment has been rendered. However, HB 1471, now law, allows a provider to perform an evaluation and management visit or an initial treatment visit before needing prior authorization. This is an important provision in our law and these rules should reflect this law.

Thank you for the opportunity to comment on this latest version of the prior authorization rules. WSLHA looks forward to continuing to work with you as these rules progress.

Sincerely,

Sommer Kleweno Walley, CCC-SLP  
President

