

MEMORANDUM

TO: Jim Freeburg, Office of the Insurance Commissioner
FROM: Gail McGaffick for the Washington State Podiatric Medical Association
Re: Prior authorization draft rules
Date: August 17, 2016

The following comments are submitted on behalf of the Washington State Podiatric Medical Association (WSPMA), a statewide organization representing over 200 podiatric physicians.

WSPMA supports the ongoing work of the OIC to establish standards for prior authorization. In particular, WSPMA appreciated the OIC's hosting of the meeting on August 10th, which resulted in an excellent exchange of perspectives by insurers and providers.

WSPMA recognizes the competing interests that the OIC must balance between insurers and consumers and providers. We believe that the bottom line should be clear standards for prior authorization so that health care consumers receive the medically necessary health care that they expect and that they have paid for; that providers are not denied payment for reasons unrelated to appropriate care delivery; and that insurers have tools to assure that they are paying for medically necessary care.

WSPMA would like to go on record as endorsing comments submitted by the Washington State Medical Association (WSMA). In its comments, WSMA gives an excellent overview of the problems and complexities of prior authorization as experienced by providers, with recommended solutions.

To conclude, WSPMA would again like to thank the OIC for its commitment to writing rules on the issue of prior authorization, so that consumers, providers and insurers know what to expect, and what is expected of them as we continue our focus on improving the health care delivery system.