



June 16, 2016

Office of the Insurance Commissioner  
5000 Capitol Blvd. SE, Tumwater WA 98501  
Attn: Jim Freeburg [rulescoordinator@oic.wa.gov](mailto:rulescoordinator@oic.wa.gov)  
Re: Matter No. R 2-16-09

Dear Mr. Freeburg,

The Washington Academy of Eye Physicians and Surgeons (WAEPS) wishes to provide you with preliminary comments concerning rules and discussions your office is undertaking with regard to prior authorization for medical services. Ophthalmologists regularly experience difficulties in obtaining prior authorization for surgeries, costly injections, and clinic visits.

While we look forward to having further, more detailed discussions with you, below is a brief outline of the primary parameters of what we would consider valid prior authorization criteria. These comments are based on our day to day experiences with attempting to work with carriers.

- We believe there should be a single portal for requesting prior authorization, applicable to all types of payors.
- We believe the criteria for granting prior authorization should be clear, transparent, and consistent between carriers.
- We believe prior authorization should be timely, meaning we should not have to stop in the middle of a surgery to request prior authorization because of a new finding during a surgery. Timely also must mean a realistically rapid timeframe for response to a request for prior authorization. Such timeframes should be consistent across payors.
- We believe there should be a standardized denial review process, also to be accomplished in a timely manner.
- We believe claims should not be denied after the fact when circumstances make it impractical to obtain prior authorization, and when emergencies occur.
- Finally, we believe there should be central and clear resources available to providers, so confusion and misunderstandings are avoided.

These guidelines will not only help achieve administrative simplification but also have the potential to achieve cost-savings as well as to improve patient care. We consider it vital that our patients receive care as quickly as possible, and that they not become the victims in disputes between providers such as ourselves and payors.

We look forward to working with you as you move ahead with these discussions, and encourage you to consider our comments in your deliberations.

Sincerely,

Michael Brush, MD, President  
Washington Academy of Eye Physicians and Surgeons