

Jim Freeburg
Washington Office of the Insurance Commissioner
PO Box 40260
Olympia, WA 98504
Email: rulescoordinator@oic.wa.gov

RE: Insurance Commissioner Matter No. R 2016-19: Prior Authorization Processes and Transparency

Dear Mr. Freeburg,

The Arthritis Foundation, which serves 1.3 million adults and 6,100 children with arthritis here in Washington, appreciates the opportunity to provide comment on the matter of Insurance Commissioner Matter No. R 2016-19: Prior Authorization Processes and Transparency. For our constituents, though each insurance plan has its own system of forms, protocols and approval procedures (and these may vary based on the medication or therapy under review), prior authorization typically causes lengthy delays in treatment, thereby restricting a person's access to vital care.

The Arthritis Foundation helps conquer everyday battles through life-changing information and resources, access to optimal care, advancements in science and community connections. Our goal is to chart a winning course, guiding families in developing personalized plans for living a full life – and making each day another stride towards a cure.

Physicians must fill out a prior authorization form whenever they prescribe a specialty medicine or treatment that is restricted or not covered under the insurer's formulary, placing an unnecessary burden on patients, pharmacies and doctors. In the current system, each insurer uses its own unique and distinct form and physicians may have to spend many hours familiarizing themselves with and completing dozens of forms, of varying length and complexity.

Under this system, after physicians process these forms, they are often required to wait days before receiving notification of an approval, denial or request for additional information.

We ask that the Insurance Commissioner consider the following requests:

- The Arthritis Foundation supports prior authorization request to be completed by insurers within 48 hours of submission rather than the five calendar days (provided in Section 11(a)(i))
- The Arthritis Foundation supports prior authorizations that are approved to remain in place for up to 12 months for people with chronic conditions, such as rheumatoid arthritis (RA). In Section 14 "Prior authorization determinations shall expire no sooner than forty-five days from date of approval" could lead to patients having to receive approval every forty-five days.

We appreciate the opportunity to comment and look forward to continuing conversation as the report is presented to the legislature and they decide on actions to take help patients in the state of Washington.

Sincerely,

A handwritten signature in black ink, appearing to read "Steven Schultz". The signature is written in a cursive style with a large initial "S".

Steven Schultz
Legislative Analyst
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