



August 12, 2016

Office of the Insurance Commissioner

Re: Home Care Association of Washington (HCAW) Comments on (R2016-19) Rules to streamline prior authorization (PA) process and make it more transparent.

Thank you for your efforts and thank you for providing us the opportunity to comment!

Our primary concern is that the prior authorization process does not cause delays of care, interruptions in continuity of care between settings or lack of access to care to those needing ongoing care upon discharge from a facility and/or upon physician order.

To that end, we request that WAC 284-43-0160 new definitions: "Expedited prior authorization request" include the following qualifying language:

"Any request for approval of care or treatment in another setting when there is a need to initiate care within 24 hours of discharge from the hospital, skilled nursing facility or referral."

The provision of skilled home healthcare is a continuation of the care plan that was instituted in the hospital, but adapted to the individual home setting and specific environmental circumstances. It is essential that there not be lag time in implementing this care. Data shows that the first few days after discharge are critical in preventing complications and unplanned readmissions, with the highest risk being the first day or two after discharge. Delays in prior authorization cause delays in discharge or delays in implementation of home health, or both. Delays in implementation of home health is a safety risk for patients needing ongoing care upon discharge.

We also ask that you include in these definitions, a definition of "Emergency prior authorization request." This would include times when an authorization is needed in less than 24 hours. Occasionally, a patient gets discharged unexpectedly and needs home health care initiated the same day! Home health agencies may be reluctant to accept these patients not knowing if they will be reimbursed without the prior authorization in place. Consequently, an emergency process for these individuals is necessary! Although these discharges are less than desirable, they can and do happen.