

From: [Tom Rehwald](#)
To: [Freeburg, Jim \(OIC\)](#)
Subject: Path Consortium Response to Latest OIC Draft Regulations on Pre-Authorization
Date: Saturday, October 15, 2016 12:49:23 PM

Hi Jim,

I appreciated our candid conversation on Thursday on these matters. My e-mail to the outside world has been down from shortly after our call on Thursday. Thankfully, our system is now back up & I am able to e-mail you our response. My hope is you will allow us the grace of the day, given my e-mail challenges.

Here are our two simple requests-

1) The OIC provides regulatory authorization for providers of diagnostic services to be able to **directly** pre-authorize services performed by the diagnostic provider with insurance payors.

2) Where the risk of compromising patient specimen integrity is deemed to be significant in the opinion of the diagnostic provider, testing may be performed in advance of obtaining a pre-authorization under the general guidelines of proposed WAC 284-43-2060 section (2). (I.e. that diagnostic providers qualify, along with treating physicians, and are included under this new 'Extenuating circumstances' section.)

Additional Commentary on Request #1-

We are seeking solutions that are relatively risk free to the payor community. As pathologists and laboratory professionals are most often the primary source of expertise for determining the appropriate selection of tests (and not the treating physician), providing a mechanism for a direct connection / dialogue will achieve a better patient outcome along with the goal of reducing administrative costs for the payor, the treating physician, and the pathologist practice or laboratory.

Our requests do not minimize the payor's right to determine which tests require pre-authorization. This is ultimately each payor's safeguard against the performance of potentially medically unnecessary testing.

Additional Commentary on Request #2-

WAC 284-43-2060 section (3) still allows each payor the right to retrospectively review a claim for medical necessity. This safeguard is reasonable to prevent abuses under the extenuating circumstances provision.

If you have any questions, feel free to contact me by e-mail (well, hopefully...) or by phone.

Tom Rehwald

Chief Executive Officer
InCyte Diagnostics
trehwald@incdx.com
(509) 892-2726



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