



October 14, 2016

Jim Freeburg  
Special Assistant to the Insurance Commissioner  
Office of the Insurance Commissioner  
Via email

Dear Jim:

On behalf of the Washington Speech-Language-Hearing Association (WSLHA), I am providing comments on the October stakeholder draft rules regarding prior authorization.

As you know, the prior authorization process continues to be extremely challenging for all health care providers, including speech-language pathologists and audiologists. This process's administrative burden results in less-than-optimum care for our patients and leads to higher health care costs overall. It is interesting that insurers feel these rules will add costs for them, when in reality, the current prior authorization process is already increasing costs for providers, patients, and the system as a whole.

WSHLA appreciates the changes in the rules that address the administrative burden being placed on our providers because of the prior authorization process. For example, delineating specific timelines for submission of documentation and decision-making will help patients get the care they need in a more timely manner.

WSHLA supports the language in this draft that requires written acknowledgement that the insurer or third party administrator (TPA) received information from a provider, including documents and information given over the phone. Many of our members experience frustration that they must submit the same documents and information multiple times, when speaking to different EviCore staff. Written acknowledgment will ease this burden.

There are also concerns regarding the proposed new category of prior authorization created in the rules, "immediate prior authorization request." There is confusion about how this category fits with emergency prior authorization, retrospective reviews of service, and extenuating circumstances. In addition, we are concerned with home health care being routinely denied under the current prior authorization process because of the confusing categories of prior authorization.

Thank you for the opportunity to comment on this latest version of the prior authorization rules. WSHLA looks forward to continuing to work with you as these rules progress.

Sincerely,

Sommer Kleweno Walley, CCC-SLP

President