



June 5, 2019

The Honorable Suzan DelBene
2330 Rayburn House Office Building
Washington, DC 20515

The Honorable Mike Kelly
1707 Longworth House Office Building
Washington, DC 20515

The Honorable Roger Marshall, MD
312 Cannon House Office Building
Washington, DC 20515

The Honorable Ami Bera, MD
1727 Longworth House Office Building
Washington, DC 20515

Dear Representatives DelBene, Kelly, Marshall, and Bera:

On behalf of the Medical Group Management Association (MGMA), I commend you for introducing the bipartisan “Improving Seniors’ Timely Access to Care Act of 2019.” Prior authorization continues to be one of the most onerous administrative processes faced by physician practices and we are very supportive of eliminating or streamlining this process. We strongly support this important legislation that seeks to significantly improve the process of prior authorization for medical services.

MGMA is the premier association for professionals who lead medical practices. Since 1926, through data, people, insights, and advocacy, MGMA empowers medical group practices to innovate and create meaningful change in healthcare. With a membership of more than 40,000 medical practice administrators, executives, and leaders, MGMA represents more than 12,500 organizations of all sizes, types, structures and specialties that deliver almost half of the healthcare in the United States.

The utilization-management requirements deployed by Medicare Advantage (MA) plans act as cost-control processes that require providers to qualify for payment by obtaining approval before performing a service. This process is overused, costly, inefficient, opaque, and, most importantly, often responsible for delays in the delivery of care to Medicare beneficiaries. This current approach to prior authorization needs to be dramatically reshaped to ensure authorization requirements are clinically valid and implemented in a way that is transparent, timely, efficient, flexible and standardized.

We are particularly appreciative of the provisions in the legislation calling on MA plans to fully embrace electronic, automated prior authorization. It is critical that health plans and providers leverage existing electronic prior authorization transaction standards if we are to decrease administrative costs and speed up the authorization process for patients. Further, including a requirement in the legislation for the Secretary to provide for real-time (electronic) prior authorization decisions will dramatically accelerate the care delivery process.

In addition, the current practice for medical groups is to fax, mail, or upload to proprietary websites the clinical data necessary to support a prior authorization request. We have called on the Secretary to release the electronic attachments (X12 275 standard) regulation to automate the collection and transmission of clinical data. Underscored in your legislation, this transaction has the potential to significantly reduce administrative burden by meeting clinical documentation requirements for prior authorization transactions, supporting claim submissions and referrals, patient transitions of care, and care coordination documentation requirements, as well as simplifying other clinical and administrative situations where patient data needs to be shared efficiently and securely.

Finally, the inclusion in the legislation of MA plan transparency requirements is imperative if we are to fully understand how MA plans implement utilization management and how these policies impact patient care. Armed with the data related to the volume of authorizations, approval rates, and the median and average amount of time between provider submission and plan determination, policymakers will have the ability to more effectively influence utilization management practices.

Your leadership on this important issue is greatly appreciated and we look forward to working together to enact this legislation and improve the prior authorization process. Should you have any questions, please contact Claire Mansbach at cmansbach@mgma.org or 202.293.3450.

Sincerely,

/s/

Anders Gilberg, MGA
Senior Vice President, Government Affairs