



October 22, 2025

The Honorable Lucy McBath
U.S. House of Representatives

The Honorable Rick Allen
U.S. House of Representatives

The Honorable Mariannette Miller-Meeks, M.D.
U.S. House of Representatives

The Honorable Raul Ruiz, M.D.
U.S. House of Representatives

The Honorable Bob Onder, M.D.
U.S. House of Representatives

Dear Representatives McBath, Allen, Miller-Meeks, Ruiz, and Onder:

On behalf of the Medical Group Management Association (MGMA), I want to thank you for reintroducing the Safe Step Act (H.R. 5509), which requires employer-sponsored health plans governed by the Employee Retirement Income Security Act of 1974 (ERISA) to establish an exceptions process for any medication step therapy protocol, and for other purposes. With a membership of more than 60,000 medical practice administrators, executives, and leaders, MGMA represents more than 15,000 medical group practices ranging from small private medical practices to large national health systems, representing more than 350,000 physicians.

MGMA strongly supports this legislation and deeply appreciates your leadership in advancing reforms that improve patient care and reduce the administrative burdens associated with prior authorization in physician practices nationwide. Among the many onerous administrative processes in today's healthcare environment, prior authorization remains one of the most burdensome for both practices and patients. Step therapy, a type of prior authorization, requires patients to try insurer-preferred treatments before accessing the therapy their clinician prescribes. These requirements often delay or disrupt necessary treatment, undermine clinical decision-making, and can result in worsened health outcomes, particularly for patients with complex or chronic conditions.

Beneficiaries in Traditional Medicare are largely exempt from step therapy requirements, and those enrolled in Medicare Advantage plans were similarly protected until CMS reversed its prior prohibition on step therapy for Part B drugs and services in 2018. Since that reversal, the use of step therapy in Medicare Advantage has risen sharply, prompting MGMA and other organizations to [call for an investigation](#) by the HHS Office of Inspector General. Step therapy

requirements are prevalent across other group health plans, and the Safe Step Act would establish clear, enforceable standards for step therapy exceptions in ERISA-governed plans, where, unlike in Medicare Advantage, federal oversight is limited, helping to prevent these practices from harming patients and providers in other markets.

MGMA has long been advocating for reducing the overall volume and burden of health plan prior authorization requirements. In 2018, MGMA joined the American Hospital Association, the American Medical Association, and the American Pharmacists Association joined with America's Health Insurance Plans and the Blue Cross Blue Shield Association to release in the [Consensus Statement on Improving the Prior Authorization Process](#), which included a review of prescription drugs and therapies that require prior authorization—yet, in the years since, prior authorization has consistently ranked as the top regulatory burden for medical group practices, and little progress has been made in curbing step therapy requirements.

This lack of movement from health plans underscores the importance of reintroducing the Safe Step Act, which would direct the Department of Labor to issue regulations within six months of enactment to implement the bill's step therapy exception provisions and ensure compliance among ERISA-governed health plans. The legislation would also require annual public reports to Congress on exception requests, denials, appeals, and trends by specialty or condition. Again, we thank you for your leadership on this critical issue, and MGMA stands ready to work with you and your congressional colleagues to ensure swift passage of this important legislation. Should you have any questions, please contact Hannah Grow at hgrow@mgma.org or 202-293-3450.

Sincerely,

/s/

Anders M. Gilberg
Senior Vice President, Government Affairs