

## Rules coordinator (policy)

Reference #	13576576
Status	Complete
First name	Intisar
Last name	Surur
Email	<a href="mailto:intisar@mcbridepa.com">intisar@mcbridepa.com</a>
Rule number/topic	CR-101 for R 2023-02 (concerning prior authorization)
Comment(s) or question(s)	<p>Quest Diagnostics respectfully submits the following comments related to CR-101 for R 2023-02 (concerning prior authorization). For background, Quest Diagnostics is a leading provider of diagnostic information services and testing. These services include discovering new ways to identify and treat disease, making it faster and easier for patients, doctors, and hospitals to access lab tests and data when they need it, and ensuring patients get the services and care they need.</p> <p>As it relates to the time frames and guidance for prior authorizations, there are unique challenges for laboratory services. Specifically:</p> <ul style="list-style-type: none"><li>- Timing does not work for lab testing since patient care is interrupted if the ordering provider does not obtain the prior authorization prior to sending the patient to a Patient Service Center (PSC).</li><li>- Date of service is the date of collection. For testing collected at a physician's office, there is no ability for a lab to obtain the prior</li></ul>

authorization when the doctor does not and no incentive for the doctor to do it. By the time the test is received by the laboratory, it is already too late to prior authorize the service. Also, if the specimen is collected at a laboratory's Patient Service Center, the lab must be able to easily perform real-time prior authorization so that access to critical testing is not negatively impacted.

Quest Diagnostics requests that the issues presented for laboratory services be considered when contemplating prior authorization rulemaking. We are happy to discuss further should there be any questions.

<b>Last Update</b>	2023-08-07 16:27:11
<b>Start Time</b>	2023-08-07 16:04:45
<b>Finish Time</b>	2023-08-07 16:27:11
<b>IP</b>	67.161.120.69
<b>Browser</b>	Chrome
<b>Device</b>	Desktop
<b>Referrer</b>	<a href="https://www.insurance.wa.gov/">https://www.insurance.wa.gov/</a>