

**From:** [Intisar Benge](#)  
**To:** [OIC Rules Coordinator](#)  
**Subject:** Comments to pre-publication draft regarding prior authorization process  
**Date:** Wednesday, September 27, 2023 5:49:07 PM

---

External Email

Rules Coordinator,

On behalf of Quest Diagnostics, we submit the following recommendations to the prepublication draft for revising the prior authorization process.

1. In 1(c), the carrier should be required to notify the requesting provider, ordering provider and enrollee. In addition, the carrier should request the information from the ordering provider.
2. It should be clear that the IT development regarding the interoperability and programming should be at the cost of the carrier.
3. The time requirements should be the carrier has up to the number of days, but it must do it sooner or waive the requirements if it adversely impacts the care, treatment, or diagnosis of the member.
4. For lab testing, where the rendering provider does not see the member, if the ordering provider does not obtain prior auth, the carrier should be required to either waive the prior auth requirement or pay in accordance with plan directed care.

We welcome the opportunity to meet with you and discuss Quest's recommendations in more detail. If you have any questions, please do not hesitate to reach out.

Respectfully,  
Intisar  
Intisar Benge (Surur)  
McBride Public Affairs LLC  
206-387-8368  
[intisar@mcbridepa.com](mailto:intisar@mcbridepa.com)  
[www.mcbridepa.com](http://www.mcbridepa.com)

This e-mail contains confidential, privileged information intended only for the addressee. Do not read, copy or disseminate it unless you are the addressee. If you are not the addressee, please permanently delete it without printing and call McBride Public Affairs LLC immediately at 206-387-8368.