

**From:** [Waltraut Lehmann](#)  
**To:** [Freeburg, Jim \(OIC\)](#); [OIC Rules Coordinator](#)  
**Subject:** discussion on prior authorization  
**Date:** Friday, June 17, 2016 9:20:35 AM

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Hello Jim,

I am responding today, as you requested, in the context of the upcoming discussions about the prior authorization process and your evaluation of the potential need for further rulemaking. Today's brief preliminary comments are being submitted on behalf of Premera Blue Cross, LifeWise Health Plan of Washington, and LifeWise Assurance Company (collectively "the Companies" or "Premera").

The Companies very much appreciate your approach of having stakeholder discussions prior to formally announcing any rulemaking. We believe that a robust stakeholder discussion is needed first of all to address broad issues in the context of prior authorizations. Only after such discussions can a more focused approach for rulemaking, if any is needed, be reasonably and practically developed.

That is why for today our comments are brief. We believe the scheduled stakeholder meeting on June 28 needs to address the needs and reasons for prior authorizations, and the benefits of the process for providers and members, in addition to issuers. I would also like to refer you to the information we provided to your office recently in response to your earlier inquiry.

Premera intends to participate in these discussions and we shall attend the June 28 meeting prepared to address a number of points in this context, in particular to lay groundwork for examining how prior authorization works, and how it may be made to work better. Participants in the meeting will include, in addition to me, Dawn Atkin, Director of Clinical Review, and Shawn West, MD, Medical Director.

Thank you, Jim. We look forward to meeting with you on the 28<sup>th</sup> - in the meantime, if you have questions for us, please contact me.

Best regards,

*Waltraut*

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