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June 21, 2024

Jane Beyer
Senior Health Policy Advisor
Washington State Office of the Insurance Commissioner

RE: [WSR 24-11-131](#)

Delivered electronically

Dear Ms. Beyer,

On behalf of the Washington State Medical Association (WSMA) and our over 13,000 physician and physician assistant members, thank you for the opportunity to provide comment on [WSR 24-11-131](#) as it relates [E2SHB 1357](#) (2023). As the primary proponent of E2SHB 1357, the WSMA and broader physician community are grateful to the legislature and OIC for its ongoing work to modernize the prior authorization process. We feel that this rulemaking will help reduce barriers to appropriate patient care, improve health outcomes, and reduce administrative expenses that increase the total cost of care in our state.

In a recent [survey by the AMA](#) of over 1,000 physicians, 94% of respondents indicated that prior authorization led to delays in patients accessing care; 89% reported that it had a negative impact on patient clinical outcomes; and 80% shared that it caused patients to abandon treatment. Accordingly, we eagerly await the full implementation of the new law and look forward to continuing to collaborate with the OIC on efforts to improve patient access to timely care.

Should you have any questions about our comment, please contact WSMA Policy Analyst, Hillary Norris, JD at hillary@wsma.org.

Sincerely,



Jeb Shepard
Director of Policy
Washington State Medical Association