

March 6, 2025

The Honorable Susan Donovan, Chair, House Committee on Health and Human Services

Via email to: HouseHealthandHumanServices@rilegislature.gov

Re: House Bill 5433, An Act Relating to State Affairs (OHIC to report on Prior Auth for drugs)

Dear Chairwoman Donovan and Members of the Committee:

On behalf of Blue Cross & Blue Shield of Rhode Island (Blue Cross), I write in support of this proposal. Based on Blue Cross's prior participation in the Office of the Health Insurance Commissioner's payer-provider-patient workgroup (commonly referred to as the Administrative Simplification Task Force), I also offer amendments to better position the group to engage in a productive effort.

Rhode Island is uniquely positioned for this type of collaborative engagement. The state's small size contributes to close working relationships. Adding the expertise and authority of OHIC as a convener creates the opportunity for constructive conversations. Blue Cross commits to being an active participant in deliberations over prior authorizations for medications.

The OHIC task force is positioned to balance the interests and concerns on Prior Authorizations for medications. Payers view prior authorization as a process to promote evidence-based care, reduce wasteful spending, and enhance patient safety. However, providers often view prior authorization as an administrative burden that adversely impacts the quality of patients' experience of care. The Committee heard these concerns in various bills. OHIC is well positioned to air the issues, take appropriate action, and report to the Assembly.

The Committee might consider the following

- 1) At page 5, lines 1-2, change the proposed phrase to read "and a report that focuses on prescription drug prior authorizations and step therapy, ~~by January~~ **March 1, 2025.**"

This specifies the review would cover both prior authorizations and step therapy processes, which have received Assembly attention. The date change enables a more thorough report by avoiding the difficulties presented by conflicting end-of-year activities.

- 2) At page 8, line 7-8, change the existing phrase to read: "(x) For the purposes of **subsections (h)(3)(v) through (h)(3)(x)** subsection (h) of this section, the workgroup meeting may be conducted in part or whole through electronic methods."

Conducting the meetings virtually enhances participation. This change will enable OHIC to conduct the meetings of the Administrative Simplification Task Force in this manner, as this amendment regarding prior authorizations is in subsection (h), but not part (h)(3).

We appreciate your consideration. Please feel free to contact me if you have any questions.

Sincerely,



Richard Glucksman, Assistant General Counsel