



June 7th, 2023

The Ohio Statehouse  
1 Capitol Square  
Columbus, Ohio 43215

RE: HB 130: A bill to establish an exemption to prior authorization requirements

Dear Honorable Members of the Ohio Insurance Committee,

On behalf of the more than 1,600 people with cystic fibrosis (CF) in Ohio, we write to express our support for HB 130, which would streamline prior authorization (PA) requirements by creating an automatic exemption on physician-by-physician basis that waives PA requirements for specific services if that physician has their requests approved the vast majority of the time. PAs can delay access to critical CF therapies and the Cystic Fibrosis Foundation supports efforts to minimize the administrative burden PAs impose on patients and their providers, enhance efficiency of the process, and promote transparency of PA requirements. We urge you to support HB 130 to ensure immediate and consistent access to critical therapies for Ohioans with CF.

#### **About Cystic Fibrosis and Prior Authorizations**

Cystic fibrosis is a life-threatening genetic disease that causes the body to produce thick, sticky mucus that clogs the lungs and digestive system, which can lead to serious infections. CF care is grounded in evidence-based clinical guidelines and as a complex, multi-system disease, CF requires an intensive treatment regimen including multiple medications. For people with CF, it is not uncommon to take seven therapies every day, and as many as twenty.<sup>1</sup> Many medications are taken year after year, and in most cases, for life. While these therapies are helping people live longer, healthier lives, we also know patients often encounter barriers to accessing them.

Prior authorizations are one of the obstacles that people living with chronic conditions, including CF, must navigate when accessing care. Time consuming PA requirements can delay the start or continuation of needed treatments, which can lead to adverse health outcomes. In a 2022 survey by the American Medical Association, 94% of physicians reported that prior authorizations led to delays in necessary care for their patients whose treatment required PA and 80% reported that PAs have led to patients abandoning their treatment at some point.<sup>2</sup> Because CF is a progressive disease, patients who delay or forgo treatment—even for as little as a few days— face increased risk of lung exacerbations, costly hospitalizations, and potentially irreversible lung damage.<sup>3</sup>

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<sup>1</sup> <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC2680350/>

<sup>2</sup> <https://www.ama-assn.org/system/files/prior-authorization-survey.pdf>

<sup>3</sup> Trimble AT, Donaldson SH. Ivacaftor withdrawal syndrome in cystic fibrosis patients with the G551D mutation. *J Cyst Fibros.* 2018 Mar;17(2): e13-e16. doi: 10.1016/j.jcf.2017.09.006. Epub 2017 Oct 24. PMID: 29079142.

#### **Bethesda Office**

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PAs can also cause significant administrative burden for CF providers and are often redundant for medications that people with CF must take indefinitely to maintain their health. In a CF Foundation survey of cystic fibrosis care teams, 58 percent of providers reported spending 20 percent or more of their time on PAs in 2016. This arduous process diverts valuable time and resources away from direct patient care.

We appreciate Ohio's attention to this issue and support the following provisions in HB 130:

#### **Gold Carding**

To reduce administrative burden and delays in care, HB 130 exempts providers from PA requirements if 80 percent of their requests were approved in the preceding 12 months, a practice known as gold carding. Once a provider obtains an exemption, they would be exempt from having to request a PA for that healthcare service for at least the next year. Because cystic fibrosis requires highly specialized care and treatment, the vast majority of people with CF receive care at a CF Foundation-accredited care center which provide quality, specialized CF care that is based in clinical guidelines. If members of a CF care team received an exemption, that care center could spend more time on patient care instead of paperwork and, most importantly, people with CF could avoid delays in care.

#### **Transparency for Prior Authorization Requirements**

The CF Foundation also supports the provision of HB 130 to increase transparency for PAs, specifically the requirement to make PA data readily available in an accessible format on health insurers' and Ohio Department of Medicaid's (ODM) public websites. We encourage Ohio to bolster these transparency efforts by requiring insurers to maintain a complete list of services that require PA, and mandate that PA requirements and criteria — and changes to these policies — are easily accessible and clearly articulated. Increasing the availability of information on PA requirements and processes at the point-of-care will help reduce the administrative burden of these policies and streamline the process for care teams.

The Foundation appreciates that PA policies were adopted to ensure patients only receive medically necessary care, and we understand the challenge insurers face in managing medication utilization and cost. However, utilization management cannot come at the expense of delays in patient access to needed care. HB 130 provides an opportunity to make prior authorization processes more transparent and efficient, allowing for timely access to appropriate treatments.

Sincerely,



#### **Mary B. Dwight**

Chief Policy & Advocacy Officer  
Senior Vice President, Policy & Advocacy

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