

AAPM&R is Fighting to Reduce Psychiatrist Burden by Removing Prior Authorization Struggles

Burdensome and unnecessary prior authorization requirements have consistently been cited by AAPM&R members, as one of the largest problems impacting your ability to deliver care to patients. As such, reforming the prior authorization process continues to be a top priority for AAPM&R's advocacy efforts.

AAPM&R's work aims to reduce the burden of your daily work (exposing the flaws of the "peer to peer" system and decreasing lengthy response times from plans) while protecting the aspects of your career that you enjoy. AAPM&R is addressing the strain of prior authorization by advocating for both legislative and regulatory changes.

Below is a list of AAPM&R's recent advocacy efforts to reform the prior authorization process.

A huge thank you to our Health Policy & Legislation (HP&L) Committee and grassroots volunteers for your work on these advocacy efforts.



Regulatory Efforts to Implement Prior Authorization Reform

AAPM&R continues to push the Centers for Medicare and Medicaid Services (CMS) on regulatory reforms to reduce the burdens imposed by unnecessary prior authorization requirements.

- AAPM&R provided feedback in February and March of this year to CMS on two proposed rules to implement prior authorization reforms. Highlights from these CMS proposals included:
 - » An interest in developing uniform and publicly available prior authorization standards for plans
 - » Implementing shorter timeframes for plans on prior authorization decisions
 - » Exploring the possibility of creating a "Gold Card" program for providers.
- We submitted comments responding to the first of these proposals from CMS, focused on reforming prior authorization under Medicare Advantage, in February.
- We submitted comments in March responding to the second proposed rule, which focused on improving electronic prior authorization processes for programs under CMS' purview.

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Federal Legislative Update on Prior Authorization Reform

AAPM&R continues to prioritize legislative action to reform the prior authorization process.

AAPM&R supports the bipartisan *Improving Seniors' Timely Access to Care Act*, federal legislation that would help protect patients from unnecessary delays in care by streamlining and standardizing prior authorization under the Medicare Advantage program. Since this initiative's initial introduction in 2019, AAPM&R has advocated for this legislation during multiple Hill Day events, created numerous grassroots campaigns for our members to contact their Congressional representatives and sent many Academy and coalition letters urging Congress to pass this important initiative.

While this legislation was not signed into law before the end of the previous Congress in 2022, it was endorsed by 53 senators and 327 representatives before passing the U.S. House of Representatives on an overwhelmingly bipartisan vote. AAPM&R is currently working with our coalition partners and Congressional champions to improve the legislative language for standalone reintroduction in the current Congress.

AAPM&R has also endorsed legislation that would exempt physicians from Medicare Advantage plan prior authorization requirements as long as they meet certain quality thresholds. This legislation, the *Getting Over Lengthy Delays in Care as Required by Doctors (GOLD CARD) Act*, has been introduced in the U.S. House of Representatives.



Coalition Efforts to Reform Prior Authorization

AAPM&R partners with numerous coalitions to amplify our impact.

- In 2022, AAPM&R joined the Regulatory Relief Coalition (RRC), a group of national physician specialty organizations advocating for regulatory burden reduction in Medicare.
- AAPM&R participates in other coalitions interested in reforming prior authorization processes, including the Coalition to Preserve Rehabilitation (CPR).

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Recent AAPM&R coalition efforts to further prior authorization reform include:

March – Improving Prior Authorization Processes for Medicare Advantage Organizations Proposed Rule from CMS:

- 3-13-23 – RRC Comments (https://www.aapmr.org/docs/default-source/protected-advocacy/rules-and-comments/comments-testimony-and-sign-on/reg_3.13.23_cms-rrc-comments-on-epa.pdf?utm_source=google&utm_medium=organic&utm_campaign=AAPMR)
- 3-13-23 – CPR Comments (https://www.aapmr.org/docs/default-source/protected-advocacy/rules-and-comments/comments-testimony-and-sign-on/reg_3.13.23_cms-cpr-comments-on-epa.pdf?utm_source=google&utm_medium=organic&utm_campaign=AAPMR)

Communications to Congress

- 7-26 - RRC Letter to Congress (<https://www.regrelief.org/wp-content/uploads/2023/07/RRC-Letter.pdf>)
- 5-26 - RRC Letter to Congress (https://www.aapmr.org/docs/default-source/protected-advocacy/rules-and-comments/comments-testimony-and-sign-on/leg_5.26.23_rrc-thank-you-letter-prior-auth-hearings.pdf?sfvrsn=9f902c7c_3)

February – 2024 Policy and Technical Changes to the Medicare Advantage and Medicare Prescription Drug Benefit Programs Proposed Rule from CMS:

- 2-13-23 – AMA Comments (https://www.aapmr.org/docs/default-source/protected-advocacy/rules-and-comments/comments-testimony-and-sign-on/ama-pa-sign-on-letter-part-c-and-d-rule.pdf?utm_source=google&utm_medium=organic&utm_campaign=AAPMR)
- 2-13-23 – RRC Comments (https://www.aapmr.org/docs/default-source/protected-advocacy/rules-and-comments/comments-testimony-and-sign-on/rrc-comments-on-medicare-advantage-policy-revisions-for-2024-.pdf?utm_source=google&utm_medium=organic&utm_campaign=AAPMR)
- 2-13-23 – CPR Comments (https://www.aapmr.org/docs/default-source/protected-advocacy/rules-and-comments/comments-testimony-and-sign-on/cpr-comments-on-ma-rule.pdf?utm_source=google&utm_medium=organic&utm_campaign=AAPMR)

To learn more about AAPM&R's advocacy efforts, visit www.aapmr.org/advocacy or contact us at healthpolicy@aapmr.org.