



Academy of  
Managed Care  
Pharmacy®

May 24, 2016

The Honorable Maggie Hassan  
Governor  
State House  
107 North Main Street  
Concord, NH 03301

RE: House Bill 1608 – Uniform Prior Authorization Forms

Dear Governor Hassan:

The Academy of Managed Care Pharmacy (AMCP) urges you to veto House Bill 1608 which would require the Insurance Commissioner to develop multiple prior authorization forms. For years, paper forms were used for prior authorization; however since 2013, an electronic standard for electronic prior authorization (ePA) has been available. AMCP and organizations that represent chain and independent pharmacists, electronic health records vendors, pharmacy benefit managers and a national healthcare standard setting organization support the adoption of ePA.

AMCP is a national professional association of pharmacists and other health care practitioners, including members in New Hampshire, who serve society by the application of sound medication management principles and strategies to improve health care for all. The Academy's almost 8,000 members develop and provide a diversified range of clinical, educational and business management services and strategies on behalf of the more than 200 million Americans covered by a managed care pharmacy benefit.

In 2013, the National Council for Prescription Drug Programs (NCPDP) published an ePA electronic transmission standard that provides for a bi-direction real-time exchange of information between prescribers and payers. NCPDP is a not-for-profit, American National Standards Institute, accredited Standards Development Organization. This ePA transaction enhances workflow and ensures a more complete information exchange between the prescriber and payer. In addition, the transaction also supports the appeal and cancellation of ePA information exchanges.

Although Section 400-A:15-e III in House Bill 1608 states that nothing shall prohibit a payer from using a prior authorization methodology that utilizes an Internet webpage, Internet webpage portal or similar electronic Internet and web-based system in lieu of a paper form, the NCPDP-SCRIPT is the only truly automated system that provides real time instantaneous responses.

AMCP believes that legislation should encourage prescriber adoption and use of true ePA and not continue to adopt paper forms. AMCP is a strong advocate for this real time response standard. It is the only standard that allows the prescriber and patient to receive timely responses.

100 North Pitt Street | Suite 400  
Alexandria, VA 22314  
800 827 2627 | 703 683 8416  
Fax 703 683 8417  
[www.amcp.org](http://www.amcp.org)

Prior authorization programs are essential evidence-based tools that are used to ensure drug benefits are administered as designed and that patients receive medication therapy that is safe, effective for their condition, and provides the greatest value. Mandating a uniform paper form and 2 business day response time contradicts existing best practices and could lead to approvals of inappropriate therapies that may compromise patient safety and increase costs.

Of additional concern is that House Bill 1608 authorizes *automatic* approval of a completed prior authorization request if the plan does not respond within 2 business days after receipt. There is no consideration given with the mandated time frames to the fact that often providers do not send enough information to the health plan to make a decision. This mandated time schedule does not allow time for the insurer to request missing documentation or to ask questions for clarification about documentation submitted. Such a short time frame is inconsistent with the purpose of prior authorization programs. Prior authorization programs must ensure patient safety and quality of care by utilizing the currently accepted clinical guidelines and practices.

Lastly, House Bill 1608 authorizes the Insurance Commissioner to spend a considerable amount of time gathering information, reviewing, adopting and implementing a standardized prior authorization paper form to be utilized by all health plans. Instead of devoting time and limited resources to developing a standard paper form, we urge you to support the adoption of the NCPDP standard. The NCPDP standard would decrease the use of paper and telephone-based processes, thereby eliminating the need for a state adopted and regulated form for prior authorizations. It is also consistent with the overall direction that the health care system is moving towards, *i.e.*, the enhanced use of technology. The increased use of electronic health records and e-prescribing and ePA will provide more efficient care for patients in New Hampshire.

We appreciate the opportunity to share our views on House Bill 1608 and respectfully urge you to veto House Bill 1608. If you have any questions, you may contact AMCP's New Hampshire advocacy leader Jody Twombly at (603)749-5019 or [jody.twombly@comcast.net](mailto:jody.twombly@comcast.net) or AMCP's Director of Legislative Affairs, Regina Benjamin, at (703) 683-8416 or [rbenjamin@amcp.org](mailto:rbenjamin@amcp.org).

Sincerely,



Susan A. Cantrell, RPh, CAE  
Chief Executive Officer