



March 27, 2020

The Honorable Mike Parson
Governor of Missouri
Missouri State Capitol
201 West Capitol Avenue, Room 216
Jefferson City, MO 65101-1556

Dear Governor Parson:

As the novel Coronavirus spreads throughout Missouri, the state's health care providers are preparing for a dramatic increase in the number of patients needing treatment. With a potentially large influx of patients who are acutely or critically ill, health care providers want to collaborate with insurers to ensure we are free to focus on giving all Missourians the best possible care.

Some progress already has been made on this front. Directives and recommendations from your administration and at the federal level have removed obstacles to access such as cost-sharing for COVID-19 testing and impediments to coverage of COVID-19 treatment. Some insurers have chosen to do much more with some providers. For example, they are changing their practices to speed up throughput for patients who are ready to leave the hospital, and to curtail the administrative burden of coverage authorization requirements. UnitedHealthcare recently waived prior authorization requirements for patients being discharged from the hospital to a post-acute care setting such as a nursing home, rehabilitation facility or long-term care hospital. This should enable more hospital capacity and less time devoted to administrative tasks. Similarly, Anthem is allowing prior authorizations of coverage that already have been granted to remain valid for 90 days, as most elective procedures in hospitals have stopped. Anthem also has waived prior authorizations for discharging patients to skilled nursing facilities.

These changes are laudable, but we hope they can be more broadly adopted to help prepare for the expected surge of patients. To that end, we ask that you encourage the following actions by the state's health insurers during the national emergency.

- Waive prior authorization requirements for hospital patients discharged to a skilled nursing level of care, or a rehabilitation or long-term acute care hospital.
- Waive copays and expand pharmacy tiers for medications in high demand and short supply, such as albuterol and insulin.
- Ensure coverage of prescriptions with more doses to reduce the need for in-person refills, if consistent with controlled substances law and good medical practice.
- Suspend requirements to purchase or source medications solely from payer-owned pharmacies (PBMs).

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The actions above would have immediate effects on improving throughput and capacity, and reducing administrative obligations in critical areas like pharmacies. The following actions would have longer term, but still important, benefits in managing the public health emergency.

- Suspend the measurement periods for any quality-based payment initiatives until the later of September 1, 2020, or one month after the national emergency declaration has expired.
- Allow prior authorization requests already approved to remain in force for at least 90 days after they were first authorized, reducing the need to reprocess mass requests to reschedule planned procedures.
- Suspend routine payer audits.

The COVID-19 public health emergency poses daunting challenges, but the members of our associations remain committed to our communities and to our mission of saving and improving lives. We are in this together and we will come through this together.

Sincerely,

Brian Bowles
Executive Director
Missouri Association of Osteopathic
Physicians & Surgeons

Ron L. Fitzwater
Chief Executive Officer
Missouri Pharmacy Association

Herb B. Kuhn
President and CEO
Missouri Hospital Association

Patrick Mills
Executive Vice President
Missouri State Medical Association

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Missouri Primary Care Association

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