

March 2, 2022

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Representative Bronna Kahle  
House Committee on Health Policy  
Michigan State House of Representatives  
Room 519, House Office Building  
201 Townsend Street  
Lansing, MI 48933

Dear Chair Kahle and Members of the House Committee on Health Policy, The Association for Clinical Oncology (ASCO) is pleased to support SB 247, which would establish guardrails around prior authorization processes in the state.

ASCO is a national organization representing physicians who care for people with cancer. With nearly 45,000 members, our core mission is to ensure that cancer patients have meaningful access to high quality cancer care.

ASCO is committed to supporting policies that reduce cost while preserving quality of cancer care; it is critical that such policies be developed and implemented in a way that does not undermine patient access. Payer utilization management approaches like prior authorization are of particular concern because they represent greater likelihood of raising barriers to appropriate care for individuals with cancer.

ASCO is pleased that the guardrails around prior authorization in SB 247:

- **Enhance clinical validity** by requiring insurers to cite evidence-based, peer-reviewed literature in their written rationale for any prior authorization denial;
- **Ensure timely access to care** by establishing an appeals process and determining that a prior authorization request must be answered within five business days under normal circumstances and within two days if the request is urgent;
- **Improve transparency** by implementing prior authorization statistical reporting requirements and ensuring that utilization management processes are posted clearly online; and
- **Alleviate administrative burden on physicians** by standardizing electronic prior authorization request forms and processes.

ASCO is encouraged by the steps that SB 247 takes toward improving prior authorization procedures in Michigan and urges the Committee to pass the measure. For a more detailed understanding of our policy recommendations on this issue, we invite you to read the [ASCO Position Statement: Utilization Management](#), from our affiliate organization, the American Society of Clinical

Oncology. Please contact Sarah Lanford at [sarah.lanford@asco.org](mailto:sarah.lanford@asco.org) if you have any questions or if we can be of assistance.

Sincerely,

A handwritten signature in black ink, appearing to read "Howard A. Burris III". The signature is fluid and cursive, with a horizontal line extending to the right.

Howard A. Burris III, MD, FACP, FASCO  
Chair of the Board  
Association for Clinical Oncology