



August 16, 2023

The Honorable Michael Burgess, MD  
U.S. House of Representatives  
2161 Rayburn HOB  
Washington, D.C. 20515

The Honorable Vicente Gonzalez  
U.S. House of Representatives  
154 Cannon HOB  
Washington, D.C. 20515

Dear Representatives Burgess and Gonzalez,

On behalf of our member medical group practices, the Medical Group Management Association (MGMA) appreciates your continued support for prior authorization reform and applauds the introduction of the GOLD CARD Act of 2023 (H.R. 4968). Prior authorization continues to result in unnecessary administrative burdens that adversely impact patients. We strongly support this commonsense legislation that would streamline and remove barriers to care. MGMA urges Congress to swiftly pass this critical bill.

With a membership of more than 60,000 medical practice administrators, executives, and leaders, MGMA represents more than 15,000 medical groups in which more than 350,000 physicians practice. These groups range from small private practices in rural areas to large regional and national health systems and cover the full spectrum of physician specialties and organizational forms.

Prior authorization continues to be a significant burden for both practices and patients, causing delays in patient care, adverse clinical outcomes, and increased paperwork and costs. In a recent MGMA survey, 82% of medical group practices rated prior authorization requirements as very or extremely burdensome, citing inconsistencies and constant changes in requirements.<sup>1</sup> Additionally, 89% of physician practices cited an increase in prior authorizations over the previous year, while less than 1% reported a decrease.<sup>2</sup>

In the wake of record inflation, staffing shortages, and across-the-board Medicare reimbursement cuts, 77% of medical group practices report redistributing staff to work on prior authorizations due to the increase in requests.<sup>3</sup> Staff are often required to follow up with several different parties involved in the prior authorization process, including patients, pharmacies, and insurance plans. When it comes to prior authorization, practices should be in the driver's seat of their patient's care.

Prior authorization remains one of the leading administrative burdens faced by medical group practices. Gold card programs are an effective way to ensure continuity and access to necessary care. Currently, medical groups report that only 7% of the Medicare Advantage plans they contract with offer gold-carding programs.<sup>4</sup>

---

<sup>1</sup> MGMA Annual Regulatory Burden [Report](#), October 2022

<sup>2</sup> MGMA Annual Regulatory Burden [Report](#), October 2022

<sup>3</sup> MGMA [Spotlight](#): Prior Authorization in Medicare Advantage, May 2023

<sup>4</sup> MGMA [Spotlight](#): Prior Authorization in Medicare Advantage, May 2023

We greatly appreciate your leadership on this issue and look forward to working together on reducing administrative burdens associated with prior authorization. MGMA and our medical group practices are committed to working with Congress to ensure appropriate solutions are implemented to improve the burden of prior authorizations in MA plans. If you have any questions, please contact Claire Ernst at [cernst@mgma.org](mailto:cernst@mgma.org) or 202-293-1354.

Sincerely, /s/

Anders Gilberg

Senior Vice President, Government Affairs