



July 20, 2022

The Honorable Michael C. Burgess, MD  
U.S. House of Representatives  
2161 Rayburn House Office Building  
Washington, DC 20515

The Honorable Vicente Gonzalez  
U.S. House of Representatives  
113 Cannon House Office Building  
Washington, DC 20515

The Honorable Ronny Jackson  
U.S. House of Representatives  
118 Cannon House Office Building  
Washington, DC 20515

Dear Representatives Burgess, Gonzalez, and Jackson,

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 2022 (H.R. 7995). 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 legislation.

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, 88% of medical group practices rated prior authorization requirements as very or extremely burdensome, citing inconsistencies and constant changes in requirements.<sup>1</sup> Additionally, nearly 80% of physician practices cited an increase of prior authorizations over the previous year, while only 2% reported a decrease.<sup>2</sup>

Alarming, a recent Office of Inspector General (OIG) report regarding Medicare Advantage Organizations (MAOs) and prior authorization denial requests found that, "MAOs sometimes delayed or denied Medicare Advantage beneficiaries' access to services, even though the requests met Medicare coverage and billing rules."<sup>3</sup> These denied services negatively impact patients and convey the urgency for the passage of this legislation.

Since the beginning of the public health emergency, 73% of medical group practices ranked staffing as their biggest pandemic challenge, which has led to increased burnout and less dedicated quality time with patients.<sup>4</sup> It is often necessary for staff dealing with prior authorizations 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 taking care of their patients. If this legislation is passed, physician practices will be able to focus on delivering high-quality patient care.

<sup>1</sup> MGMA Annual Regulatory Burden [Report](#), October 2021

<sup>2</sup> MGMA [Statement](#) on Latest Prior Authorization Data, March 3, 2022

<sup>3</sup> OIG Some Medicare Advantage Organization Denials of Prior Authorization Requests Raise Concerns About Beneficiary Access to Medically Necessary Care [Report](#), April 27, 2022

<sup>4</sup> MGMA [Stat.](#), September 22, 2021



For the past several years, prior authorization has remained one of the leading administrative burdens faced by medical group practices. We are confident that a gold card policy would be effective in ensuring continuity of care and removing barriers for patients. 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, and we welcome the opportunity to serve as a resource to our members combatting this issue. If you have any questions, please contact Swapna Pachauri at [spachauri@mgma.org](mailto:spachauri@mgma.org) or 202-293-3450.

Sincerely,

/s/

Anders Gilberg  
Senior Vice President, Government Affairs