

August 1, 2023

Rhonda Randall, D.O.
Chief Medical Officer / Executive Vice President
UnitedHealthcare Employer and Individual
9900 Bren Road East
Minnetonka, MN 55343

Dear Dr. Randall,

On behalf of our members who care for digestive health patients, I'm writing to express continued concern about UnitedHealthcare's Advance Notification Program for gastrointestinal endoscopy procedures announced on June 1, as well as UnitedHealthcare's proposed "Gold Card" prior authorization program that is planned for 2024.

Specifically, we want to flag three areas of concern. This letter provides more background and detail from our member practices.

- Please share UnitedHealthcare's deidentified aggregate data on which the Advance Notification program is based.
- Please clarify: Will GIs not participating in the Advance Notification program automatically be subject to prior authorization when UnitedHealthcare implements the 2024 Gold Card program?
- Please provide specific details: How will information gathered through the Advance Notification program shape the GI Gold Card prior authorization program that UnitedHealthcare plans to implement in 2024?

AGA requests a written response to each of these three issue areas and a meeting to discuss these concerns and questions.

Lack of transparency

The Advance Notification Program started without adequately informing gastroenterologists or addressing the questions and concerns raised by AGA, the American College of Gastroenterology, and the American Society of Gastrointestinal Endoscopy. Despite multiple requests, you have not shared any **UnitedHealthcare-specific overuse or variation data on a code-by-code basis that would warrant such a burdensome process. Please share the deidentified aggregate data.** Absent data, there is no rationale for such a policy.

The Advance Notification program directly contradicts UnitedHealthcare's publicly stated goals of reducing administrative burden and streamlining access to care—goals we support and encourage you to work toward in the gastroenterological specialty. In contrast, Advance Notification is imposing significant administrative burdens on

physician practices, which will negatively impact patient access to timely, medically necessary care.

Practice burden

The chaotic rollout of the new data reporting requirements led to widespread confusion throughout the gastroenterological community and has since forced physicians and staff to spend multiple hours every day completing reporting requirements for data that UnitedHealthcare already has through claims forms. This is a serious drain on gastroenterology practices' time, staff, and resources—which should be entirely focused on patient care, not reams of paperwork.

Reports from our members around the country:

- Most local UHC representatives are unaware of the Advance Notification Program for GI endoscopy program and are unable to advise them regarding concerns or problems.
- Local UHC representatives have no information on the Gold Card program and how it might operate.
- Many practices report they have not received any follow-up from UHC requesting additional records via the Advance Notification Program.
- Some large GI practices report it takes their staff 5-7 minutes per patient to enter the required data. Others quantify the additional work of participating in the advance notification program as 25-35% more work than before the program was implemented.
- Practices with large UHC volume report having to divert multiple staff to work full time on UHC accounts.
- All practices report that they are required to input/upload the same clinical information as other UHC prior authorizations. Some practices additionally take a screenshot of the statement that the procedure does not require precertification and place it in the patient notes as a precaution in case issues arise in the future.
- GI practices that have tried to use the telephone number to report a change in procedure report spending an average of an hour on hold per case.

Given these challenges, many practices are not participating. **Will GIs not participating in the Advance Notification program automatically be subject to prior authorization when the Gold Card program is implemented?**

Gold Card program

AGA remains deeply unsettled by UnitedHealthcare's Gold Card prior authorization program intended to be rolled out sometime in "early 2024." It is unclear what benefits any planned Gold Card may be bestowed on qualified physicians, nor is it clear what the eligibility requirements are or how many groups will be eligible.

How will information gathered through the advance notification program shape the GI Gold Care/prior authorization program that United plans to implement in 2024?

AGA is troubled by the serious lack of specific details about the Gold Card prior authorization program to date. With less than six months until 2024, UnitedHealthcare has not issued any details about eligibility criteria, participation, or what new prior authorization requirements may be implemented for practices that do not qualify for a Gold Card. We resolutely oppose the implementation of any type of pre-authorization requirements for colonoscopies and endoscopies. We are medical practitioners who have years of training and experience treating patients. Our medical decisions are evidence-based, which no prior authorization policy can claim.

As you recognized when announcing UnitedHealthcare will slash prior authorization requirements by 20% earlier this spring, requiring physicians to apply for and receive pre-approval before being able to deliver medically necessary care is not just frustrating—it is disruptive and dangerous for patients' health. This is particularly true when it comes to performing colonoscopies and endoscopies, which are vital for detecting and monitoring diseases such as inflammatory bowel disease and colorectal cancer, the second deadliest form of cancer in the United States.

AGA stands ready to partner with UnitedHealthcare on mutually beneficial educational initiatives to promote appropriate use of endoscopy procedures. However, we reiterate our call for UnitedHealthcare to halt the confusing and burdensome Advance Notification Program – and scrap plans to implement a Gold Card prior authorization program as planned in 2024. Instead, we invite UnitedHealthcare to work collaboratively with us to develop programs that improve quality of care without creating barriers to treatment for patients and unnecessary and inappropriate administrative burdens for physicians.

We urge you to stop the Advance Notification and any prior authorization programs impacting GI endoscopy and directly engage with AGA to ensure patients' continued access to high-value, patient-centered endoscopy care. Please contact Leslie Narramore at lnarramore@gastro.org at your earliest convenience so we can resume our dialogue.

Sincerely,



Barbara H. Jung, MD, AGAF
President, American Gastroenterological Association