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September 30, 2025

Councilmember Christina Henderson Chair, Committee on Health 1350 Pennsylvania Ave NW Washington, DC 20004

Dear Chair Henderson,

My name is Dr. Klint Peebles, and I am the Chair of the Medical Society of DC Advocacy Committee as well as President-Elect-designate for MSDC in 2026.

While Dr. Winston is testifying on behalf of MSDC, I wanted to testify today to emphasize the importance of ensuring compliance with the Prior Authorization Reform law passed and funded with your leadership. I know there were concerns in the payer community about some aspects of the law but I want to emphasize the importance of the MCOs in complying with and reporting on specific aspects of the law. Every day, physicians in the District see treatment interruptions, medication denials, and burdensome appeals. These delays not only worsen health outcomes but also deepen inequities. This is why strong oversight is essential.

In particular, I want to commend your committee for asking for metrics on length of determinations. It was only a few years ago – 2019 – that AmeriHealth had a 20% denial rate on prior authorization requests. I look forward to your committee receiving responses on the turnaround time on prior authorization requests and suggest asking for further data on primary reasons for denials, beyond the usual catch-all of inadequate paperwork. To build on this, I respectfully urge the committee to require standardized reporting of denial rates, turnaround times, and appeal outcomes as well as transparency on reviewer credentials, including licensure location and specialty.

Additionally, we would be interested in the committee exploring not just the network adequacy for patients but also for providers. Reviews must be conducted by physicians licensed in the tri-state area and in the same or similar specialty as the treating clinician, as required by law. Ensuring this provision is followed is essential to both patient fairness and provider confidence. Because of the negative effects a denial has on patients, it is important to have statistics on who are reviewing these requests.

The Prior Authorization Reform Amendment Act was an achievement to help provide equitable care to residents of the District. But without vigilant oversight, its promise risks being undermined. On behalf of our patients and the physicians who serve them, I urge this committee to continue demanding accountability and transparency from MCOs. Thank you for your leadership and for the opportunity to testify today.

Sincerely, Klint Peebles, MD