

Providence Health & Services  
4400 N.E. Halsey St., Building 2  
Suite 599  
Portland, OR 97213  
[www.providence.org/oregon](http://www.providence.org/oregon)



February 6, 2019

The Honorable Laurie Monnes- Anderson  
Chair, Senate Health Care Committee  
State Capitol  
Salem, Oregon 97301

RE: Senate Bills 236 and 587

Dear Senator Monnes Anderson and members of the committee:

On behalf of Providence Health Plan, I want to thank you for the opportunity to provide our input regarding Senate Bills 236 and 587.

Providence Health Plan is an active and productive partner with providers. We are committed to simplifying administrative processes in meaningful and financially viable ways. While we are not interested in creating unnecessary burden, we cannot support policies that erode our ability to protect members and ensure affordability.

Senate Bills 236 and 587 would do just that - by prohibiting health plans from requiring prior authorization for an initial evaluation by a participating therapist, and six subsequent treatment visits with the therapist, for a new episode of care. Prior authorization is an essential tool that ensures that the services delivered to our members are appropriate and cost-effective. Providence has mechanisms in place to ensure that our members are able to receive physical and occupational therapy services without undue delay. We regularly review services subject to prior authorization, including eliminating requirements for services that no longer warrant prior authorization. Senate Bills 236 and 587 would impair our ability to manage the health and care of our members related to physical and occupation therapy services.

Providence strongly encourages the Committee to join us in opposition. Thank you for the opportunity to provide comments.

Sincerely,

A handwritten signature in blue ink, appearing to read "R. Gluckman, MD, MACP".

Robert Gluckman, MD, MACP  
Chief Medical Officer for Providence Health Plans