

Andrew Witty
Chief Executive Officer
UnitedHealth Group
9900 Bren Rd E
Minnetonka, MN 55343

April 14, 2023

Dear Mr. Witty,

The undersigned organizations are writing on behalf of the colorectal cancer community to ask you to stop United Healthcare's program to require prior authorization for almost all upper gastrointestinal (GI) endoscopy, colonoscopy and capsule endoscopy procedures scheduled to begin June 1, 2023, for Commercial plans in almost every market.

Colorectal cancer is the second leading cause of cancer death for men and women combined, but it can be prevented if caught early through timely screening. Further, the National Cancer Institute confirms that "colorectal cancer is a leading cause of cancer death among people under 50 in the United States, with rates of new diagnoses still climbing in this age group."¹ United's prior authorization program for GI endoscopy, even though it excludes screening colonoscopy, will most certainly have a chilling effect on patients' willingness to undergo medically recommended subsequent colonoscopy examinations after polyps are removed or for diagnostic testing when they have symptoms.

United's program will undoubtedly cause delays of care for individuals at high-risk for colorectal cancer such as those with a genetic condition like Lynch Syndrome or a family history. The Center for Consumer Information and Insurance Oversight (CCIIO) states that "Identification of 'high-risk' individuals is determined by clinical expertise."² If a medical provider determines that a patient is high-risk for colorectal cancer, and a U.S. Preventive Services Task Force recommendation applies to that high-risk population, that service is required to be covered in accordance with the requirements of the interim final regulations, without cost-sharing. However, United will require those patients to wait to receive approval via its prior authorization process before they can receive treatment even though they have been deemed at 'high risk' for colorectal cancer by a physician. To create an additional barrier for those identified as high risk for developing colorectal cancer is irresponsible and deeply concerning.

According to a survey conducted by the American Medical Association, more than one-third (34%) of physicians reported that prior authorization led to a serious adverse event, including hospitalization (24%), and disability or even death (8%) for a patient in their care. Eighty percent of physicians report that the prior authorization process can lead to treatment abandonment.³ This policy will also likely exacerbate existing sociodemographic disparities in care and outcomes, as the most vulnerable patients are most subject to access issues.

¹ <https://www.cancer.gov/news-events/cancer-currents-blog/2020/colorectal-cancer-rising-younger-adults>

² https://www.cms.gov/CCIIO/Resources/Fact-Sheets-and-FAQs/aca_implementation_faqs12

³ <https://www.ama-assn.org/system/files/prior-authorization-survey.pdf>

United's timing for the announcement of a program designed to limit access to GI endoscopy procedures, including colonoscopy, during Colorectal Cancer Awareness month is insensitive and out of touch. Furthermore, it is at odds with the United press release put out shortly after this announcement that stated, "Starting this summer, UnitedHealthcare is eliminating nearly 20% of current prior authorizations, as part of a comprehensive effort to simplify the healthcare experience for consumers and providers."⁴ We encourage you to hold true to this sentiment and not implement a policy that will make it more difficult for patients to receive potentially life-saving colorectal cancer screening.

United's short-sighted GI endoscopy prior authorization program has not been well designed, will result in delays for medically necessary care for patients, and adds unnecessary paperwork burden to physicians and their staff. For these reasons, we urge you not to implement the GI endoscopy prior authorization program.

Sincerely,

Fight Colorectal Cancer
AliveandKick'n
Ambulatory Surgery Center Association
American College of Gastroenterology
American Gastroenterological Association
American Society for Gastrointestinal Endoscopy
Association of Black Gastroenterologists and Hepatologists
CancerCare
Cancer Support Community
Cheeky Charity
College of American Pathologists
Colorectal Cancer Alliance
Crohn's & Colitis Foundation
FORCE: Facing Our Risk of Cancer Empowered
GI Cancers Alliance
Hitting Cancer Below the Belt
Louisiana Cancer Prevention & Control Programs
National Coalition for Cancer Survivorship
ONE CANCER PLACE
Prevent Cancer Foundation
Raymond Foundation
The Gloria Borges WunderGlo Foundation
United Ostomy Associations of America
Washington Colon Cancer Stars
Young Adult Survivors United

⁴ <https://newsroom.uhc.com/experience/easing-prior-authorizations.html>