



April 17, 2023

Sir Andrew Witty
Chief Executive Officer
UnitedHealth Group
9900 Bren Rd E
Minnetonka, MN 55343
andrew.witty@uhg.com

Dear Sir Andrew,

On behalf of the ambulatory surgery center (ASC) community, I respectfully ask that you rescind United Healthcare's proposed program to require prior authorization for almost all upper gastrointestinal (GI) endoscopy, colonoscopy and capsule endoscopy procedures. The policy, which will affect commercial plans in almost every market, will deter patients from seeking and receiving vital gastrointestinal care and will lead to unnecessary disease progression and death.

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. United's prior authorization program for GI endoscopy, even though it excludes screening colonoscopy, will 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.

Gastroenterology is a major specialty performed in surgery centers. In 2020, four of the top five commercial procedure codes performed in surgery centers by volume were GI and, therefore, would be subject to this prior authorization policy. We are extremely concerned by United's lack of evidence supporting the need for this policy; thus far, United has provided zero concrete data or literature showing GI overutilization patterns that would justify medical necessity reviews. Without knowing what factors led to the policy, or how codes were reviewed for inclusion in it, it is not clear that there is any clinical or cost justification.

This policy has not been well designed, lacks clinical justification, will result in delays for medically necessary care for patients and adds unnecessary paperwork burden to physicians and their staff. Accordingly, we urge you not to implement the GI endoscopy prior authorization program.

Sincerely,

A handwritten signature in black ink, appearing to read "W Prentice", is written over a light blue horizontal line.

William Prentice
Chief Executive Officer