

NAIRO

National
Association of
Independent
Review
Organizations

February, 09 2009

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President Barack Obama
The White House
1600 Pennsylvania Avenue NW
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Dear Mr. President,

The National Association of Independent Review Organizations (NAIRO) wholly supports the right promoted in your healthcare plan for all Americans to have access to health insurance. NAIRO requests that the plan go one step further by guaranteeing that those Americans who are insured are granted the right to request an independent review of coverage decisions. This right is best served by an organization that is not affiliated with either the enrollee's provider or their health plan – an Independent Review Organization (IRO).

Independent Review Organizations were formed in response to states' Patients' Bill of Rights acts that afford patients a right to an external independent review of a health plan's decision to deny, reduce, or terminate care. Accredited IROs, like those involved in NAIRO, review healthcare claims based on current medical literature, technology and generally accepted practice guidelines— information that payers/health plans cannot always stay current on. Independent external review is widely cited as a fair, impartial, and usually expeditious and cost effective way to resolve disputes. IROs might find that:

- A new cancer treatment is no longer "Experimental/Investigational," but is a standard-of-care treatment yet remains excluded by a health plan. An example of this is gene expression testing that predicts a response to chemotherapy or risk of recurrence in women with breast cancer.
- Continuous glucose monitoring is medically necessary for a diabetic patient who does not achieve adequate glycemic control using conventional measures.
- Certain therapies or treatments may be determined to be restorative in nature and considered medically necessary based on the terms of a health plan's coverage provisions.

Although IROs cannot monitor health plans or guarantee an enrollee treatment, we can balance the needs of the healthcare payer with those of the plan enrollee by providing up-to-date medical evidence about a treatment or service. For the payer, IROs allow health plans to make evidence-based healthcare determinations for patients while helping to manage plan costs. For plan enrollees, IROs ensure that each plan member receives the coverage contracted for by a plan. This means better coverage for patients and lower costs for payers. According to a recent article in Parade magazine by Lori Andrews, a health law professor at Chicago-Kent College of Law, fifty percent of the patients challenging their denials utilizing IROs get their coverage denials reversed.

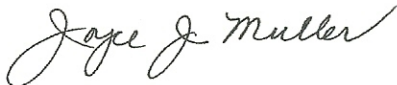
When weighing the medical evidence and insurance benefit, payers/health plans outsourcing decisions to IROs often gain specialized medical insights they find impossible to afford otherwise or to which they have limited access. This assures their enrollees receive evidence-based determinations about the medical necessity of a treatment, which ultimately saves health plans money by ensuring they provide enrollees with the most current and cost-effective treatment options.

This past summer, the National Association of State Insurance Commissioners (NAIC) reaffirmed the patient's right for an independent review and adopted a new model act. It provides uniform standards for the establishment and maintenance of external review procedures to assure covered persons have the opportunity for an independent external review of an adverse determination or final adverse determination, if their healthcare case is denied by a healthcare plan.

But having over forty four different state plans with various definitions about what can be appealed, about what is an urgent or emergent appeal and with various and inconsistent timeframes to complete an appeal, requires uniform and consistent definitions. NAIRO believes that consistency and uniformity is done best at the federal level.

We urge you to include in your health care delivery plans a strategy to ensure a patient's right to request an external review from an IRO that is independent of the provider or health plan. The members of NAIRO stand ready to assist you in this important patient care right.

Sincerely,



Joyce J Muller
President, NAIRO

On behalf of NAIRO Members:

Advanced Medical Reviews, Inc – Los Angeles, CA
Alicare Medical Management – Salem, NH
AllMed Healthcare Management, Inc – Portland, Oregon
HealthClaim Review – Laguna Hills, CA
IMEDECS – Lansdale, PA
IPRO, Inc – Lake Success, NY
Lumetra – San Francisco, CA
MCMC LLC – Boston, MA
Medical Review Institute of America, Inc – Salt Lake City, UT
MPRO – Farmington Hills, MI
National Medical Reviews, Inc – Trevese, PA
Permedion, Inc – Westerville, OH
PMSCO HealthCare Consulting – Harrisburg, PA
Prest & Associates, Inc. – Madison, WI
ProPeer Resources, Inc – North Salt Lake, UT
South Florida Utilization Review – Coral Gables, FL

Enclosures