



April 28, 2020

VIA EMAIL: [richard.migliori@uhc.com](mailto:richard.migliori@uhc.com)

Dr. Richard Migliori  
Chief Medical Officer  
United Health Group Center  
9900 Bren Rd.  
East Minnetonka, MN 55343

Dear Dr. Migliori:

The American College of Radiology (ACR), representing more than 39,000 radiologists, radiation oncologists, nuclear medicine physicians and medical physicists, requests your assistance in ensuring that UnitedHealthcare patients have timely access to important testing and treatment that has been put on hold during the COVID-19 crisis. To achieve this goal, the ACR asks that UnitedHealthcare suspend prior authorization requirements for imaging services until three months beyond rescindment of the public health emergency (PHE).

As you are aware, in compliance with national, state and local guidelines and directives, all “non-emergent” healthcare in most areas of the country has been suspended, including imaging services. As the country begins to slowly re-open and embrace new practices and regulations to safeguard the delivery of routine healthcare, imaging practices will face a backlog of non-COVID services that were cancelled or deferred during the PHE. ACR members estimate that it will take 4-12 weeks to resolve this backlog in some modalities and up to as much as 27 weeks for others.

In addition, hospitals and physician practices around the country are experiencing significant reductions in revenues as a result of the cancellation of non-emergent services. This has resulted in staff lay-offs and furloughs in all types of care settings, including staff dedicated to prior authorization processes in referring physician and imaging practices. Prior authorization is a major barrier for primary care physicians and various specialists. Navigating these prior authorization requirements with limited staffing while taking into account necessary augmented symptom screening, increased equipment and office space sanitation practices related to COVID-19 mitigation, patient preference and non-traditional times of operation will only result in further delays of patient testing and treatment and further overwhelm exhausted healthcare professionals. Avoiding further delay of care for patients who have already postponed testing would be best practice, and implementing a moratorium on prior authorization would accomplish this desperately needed improvement in efficiency.

A moratorium on prior authorization would significantly help radiology practices and their referring providers best serve their patients and assist in ensuring an efficient recovery effort on the enormous backlog of imaging exams that have accumulated since early March and for some time to come. The Centers for Medicare and Medicaid Services (CMS) issued [guidance](#) last

Richard Migliori

April 28, 2020

Page Two

week encouraging Medicare Advantage plans to exercise their right to waive or relax prior authorization requirements “in order to facilitate access to services with less burden on beneficiaries, plans and providers.” We urge UnitedHealthcare to follow suit with this CMS guidance for its commercial plans.

Should you have any questions or wish to discuss our recommendation further, please contact Kathryn Keysor, Senior Director, Economics and Health Policy via email at [kkeysor@acr.org](mailto:kkeysor@acr.org). Thank you for your consideration of our urgent request, and we look forward to your timely response.

Sincerely,

A handwritten signature in black ink, appearing to read "William T. Thorwarth, Jr. MD, FACR". The signature is fluid and cursive, with a large initial "W" and "T".

William T. Thorwarth, Jr., MD, FACR

Chief Executive Officer

Cc: Megan Abbate, UnitedHealthcare  
Kathryn Keysor, ACR