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May 17, 2024

Senator Joseph P. Addabbo Jr.  
188 State Street  
Room 811  
Albany, NY 12247

Senator Nathalia Fernandez  
188 State Street  
Room 814  
Albany, NY 12247

Senator Cordell Cleare  
188 State Street  
Room 905  
Albany, NY 12247

Senator Patrick M. Gallivan  
188 State Street  
Room 311  
Albany, NY 12247

Dear Senator Addabbo Jr., Senator Cleare, Senator Fernandez, and Senator Gallivan,

The American Academy of Neurology (AAN), is the world's largest association of neurologists and neuroscience professionals, with over 40,000 members. The AAN's mission is to enhance member career fulfillment and promote brain health for all. A neurologist is a doctor with specialized training in diagnosing, treating, and managing disorders of the brain and nervous system such as Alzheimer's disease, stroke, concussion, epilepsy, Parkinson's disease, multiple sclerosis, headache and migraine.

The AAN writes to express our support for S.3400. This legislation would help to streamline the prior authorization (PA) process and reduce barriers experienced by patients, and their physicians, that delay access to treatment. Additionally, this legislation will protect patients' access to needed prescription medications and tests to facilitate accurate diagnosis. The AAN strongly supports the passage of S.3400 that will streamline the prior authorization process for physicians.

Utilization management tools such as PA can be time consuming and expensive administrative requirements that take away from direct patient care and be dangerous for patients. These tools not only cost an estimated \$93.3 billion annually on the US healthcare system,<sup>1</sup> but has also been reported to lead to patient treatment abandonment by 80 percent of physicians, with 33 percent reporting that PA has led to a serious adverse event (such as hospitalizations, permanent impairment, disability, or even death) for a patient in their care.<sup>2</sup> For neurologic patients with chronic conditions, there is often no "one size fits all" course of treatment. Prompt access to care is essential to minimize risks of dangerous complications and side effects.

Prior Authorization also creates high level of burden on the medical care system, with 88 percent of physicians describe the burden associated with PA as high or extremely high, averaging 45 prior authorizations a week, taking around 15 hours a week to process.<sup>2</sup> The gap between demand for and supply of neurologic services is widening due to several factors, including an aging population increasingly afflicted with neurodegenerative disorders.<sup>3</sup>

<sup>1</sup> <https://www.healthaffairs.org/doi/abs/10.1377/hlthaff.2021.00036>

<sup>2</sup> <https://www.ama-assn.org/system/files/prior-authorization-survey.pdf>

<sup>3</sup> <https://www.neurologylive.com/view/the-grave-threat-posed-by-the-shortage-of-neurologists>

Use of physician time to complete PA processes reduces patients' abilities to receive timely care. The AAN is very concerned by the expansion of PA throughout the health care system and supports efforts to protect the physician-patient decision-making process.

S.3400 will not eliminate prior authorization; instead, S.3400 is a multifaceted approach that will improve access to and continuity of care for patients, promote transparency and fairness in the prior authorization process, and minimize the use of unnecessary prior authorization for services that are routinely approved. These improvements will benefit many neurologic patients who require timely access to care for their chronic conditions.

On behalf of the AAN, our 40,000 members, and their patients, thank you for your efforts on S.3400. Please don't hesitate to contact Grant Niver, Senior State Affairs Program Manager, at [gniver@aan.com](mailto:gniver@aan.com) with any questions. Thank you for your leadership on this issue.

Sincerely,

A handwritten signature in black ink that reads "Carlayne E. Jackson". The signature is written in a cursive, flowing style.

Carlayne E. Jackson, MD, FAAN  
President, American Academy of Neurology