

October 17, 2025

Commissioner Grace Arnold
Chair
Regulatory Framework (B) Task Force
National Association of Insurance Commissioners
1101 K Street, N.W., Suite 650
Washington, DC 20005

Re: Draft 2026 Charges the Regulatory Framework (B) Task Force

Dear Chair Arnold:

On behalf of the physician and medical student members of the American Medical Association (AMA), thank you for the opportunity to comment on the proposed 2026 charges for the National Association of Insurance Commissioners (NAIC) Regulatory Framework Task Force (Task Force).

The AMA is grateful to the Task Force for its efforts on prior authorization reform this year and believes the best next step for the Task Force is the development of prior authorization working group. As we mentioned in our August comments on the draft white paper on prior authorization, we think the Task Force has a critical role to play in identifying opportunities for state regulators to ensure that prior authorization is not preventing access to medically necessary care. A working group could focus on recommendations included in the final white paper, aggregating states' experiences with implementation of prior authorization reforms, and identifying best practices for addressing implementation and enforcement challenges. Additionally, a working group could consider model prior authorization legislation.

We urge the creation of a prior authorization working group to be considered as part of the Task Force's 2026 charges. Thank you for your consideration.

Please reach out to me directly at 312-464-5288 or John.Whyte@ama-assn.org if you have questions or need further information.

Sincerely,



John Whyte, MD, MPH