



# KENTUCKY PUBLIC PENSIONS AUTHORITY

Ryan Barrow, Executive Director

1260 Louisville Road • Frankfort, Kentucky 40601  
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March 10, 2025

Ms. Maurya Allen  
Executive Assistant, Director's Office  
Legislative Research Commission  
Capitol Annex, Room 186  
Frankfort, KY 40601

AA Statement 1 of 3.

RE: House Bill 423 (2025 RS BR 278) – SCS 1  
AN ACT relating to prior authorization  
AA Statement Required by KRS 6.350

Dear Ms. Allen:

The Kentucky Public Pensions Authority (KPPA) had previously provided an Actuarial Analysis of the GA for House Bill 423 (2025 RS BR 278) via a letter dated February 24, 2025. KPPA has now examined SCS 1 for House Bill 423 (2025 RS BR 278).

We have determined that the SCS 1 for House Bill 423 (2025 RS BR 278) would not change the previous actuarial impact provided for this legislation. Therefore, the Actuarial Analysis of the GA for House Bill 423 (2025 RS BR 278) dated February 24, 2025, is applicable to SCS 1 for House Bill 423 (2025 RS BR 278).

We have not requested any further actuarial analysis of SCS 1 for House Bill 423 (2025 RS BR 278) by the Authority's independent actuary. Please let me know if you have any questions regarding our analysis of SCS 1 for House Bill 423 (2025 RS BR 278).

Sincerely,

A handwritten signature in blue ink, appearing to read "Ryan Barrow".

Ryan Barrow, Executive Director  
Kentucky Public Pensions Authority



# KENTUCKY PUBLIC PENSIONS AUTHORITY

Ryan Barrow, Executive Director

1260 Louisville Road • Frankfort, Kentucky 40601  
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February 24, 2025

AA Statement 1 of 3.

Ms. Maurya Allen  
Executive Assistant, Director's Office  
Legislative Research Commission  
Capitol Annex, Room 186  
Frankfort, KY 40601

RE: House Bill 423 (2025 RS BR 278) – GA Version  
AN ACT relating to prior authorization  
AA Statement Required by KRS 6.350

Dear Ms. Allen:

Kentucky Public Pensions Authority (KPPA) had previously provided an Actuarial Analysis for House Bill 423 (2025 RS BR 278) – HCS 1 Version via letter dated February 24, 2025. KPPA has now examined the GA Version of House Bill 423 (2025 RS BR 278).

We have determined that the GA Version of House Bill 423 (2025 RS BR 278) would not impact the previous actuarial analysis provided for this legislation. Therefore, the Actuarial Analysis of House Bill 423 (2025 RS BR 278) – HCS 1 Version dated February 24, 2025, is applicable to House Bill 423 (2025 RS BR 278) GA Version.

We have not requested any further actuarial analysis of House Bill 423 (2025 RS BR 278) – GA Version by the Authority's independent actuary. Please let me know if you have any questions regarding our analysis of House Bill 423 (2025 RS BR 278) – GA Version.

Sincerely,

A handwritten signature in blue ink, appearing to read "Ryan Barrow".

Ryan Barrow, Executive Director  
Kentucky Public Pensions Authority



## KENTUCKY PUBLIC PENSIONS AUTHORITY

Ryan Barrow, Executive Director

1260 Louisville Road • Frankfort, Kentucky 40601  
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February 24, 2025

AA Statement 1 of 3.

Ms. Maurya Allen  
Executive Assistant, Director's Office  
Legislative Research Commission  
Capitol Annex, Room 186  
Frankfort, KY 40601

RE: House Bill 423 (2025 RS BR 278) – HCS 1 Version  
AN ACT relating to prior authorization  
AA Statement Required by KRS 6.350

Dear Ms. Allen:

The Kentucky Public Pensions Authority (KPPA) had previously provided an Actuarial Analysis of House Bill 423 (2025 RS BR 278) via letter dated February 18, 2025. KPPA has now examined the HCS 1 Version of House Bill 423 (2025 RS BR 278).

We have determined that the HCS 1 Version of House Bill 423 (2025 RS BR 278) would not change the previous actuarial impact provided for this legislation. Therefore, the Actuarial Analysis of House Bill 423 (2025 RS BR 278) dated February 18, 2025, is applicable to HCS 1 Version of House Bill 423 (2025 RS BR 278).

We have not requested any further actuarial analysis of HCS 1 Version of House Bill 423 (2025 RS BR 278) by the Authority's independent actuary. Please let me know if you have any questions regarding our analysis of HCS 1 Version of House Bill 423 (2025 RS BR 278).

Sincerely,

A handwritten signature in blue ink, appearing to read "Ryan Barrow".

Ryan Barrow, Executive Director  
Kentucky Public Pensions Authority



# KENTUCKY PUBLIC PENSIONS AUTHORITY

Ryan Barrow, Executive Director

1260 Louisville Road • Frankfort, Kentucky 40601  
kyret.ky.gov • Phone: 502-696-8800 • Fax: 502-696-8822



February 18, 2025

Ms. Maurya Allen  
Executive Assistant, Director's Office  
Legislative Research Commission  
Capitol Annex, Room 186  
Frankfort, KY 40601

AA Statement 1 of 3.

RE: House Bill 423 (2025 RS BR 278)  
AN ACT relating to prior authorizations  
AA Statement Required by KRS 6.350

Dear Ms. Allen:

The Kentucky Public Pensions Authority (KPPA) staff have reviewed the proposed legislation and certify the following in accordance with KRS 6.350 (2)(c):

1. The estimated number of individuals potentially affected as of June 30, 2024 are 433,461 active, inactive, and retired members in the plans administered by KPPA;
2. There is no estimated change in benefit payments;
3. There may be an increase in employer costs if new healthcare regulations and prior authorization exemptions requiring external review increases insurance premiums for plans offered by the KPPA; and
4. There is no estimated change in administrative expenses.

KPPA has not sought further analysis of the proposed legislation from the independent actuary.

Should you have any questions regarding our assessment of the proposed bill, please contact us.

Sincerely,

A handwritten signature in dark ink, appearing to read "Ryan Barrow".

Ryan Barrow, Executive Director  
Kentucky Public Pensions Authority



# JUDICIAL FORM RETIREMENT SYSTEM

JUDICIAL RETIREMENT PLAN | LEGISLATORS RETIREMENT PLAN

Daniel Venters, Chairman  
Board of Trustees

Bo Cracraft  
Executive Director

March 11, 2025

Mrs. Maurya Allen  
Deputy Director's Office  
Legislative Research Commission  
Capitol Annex, Room 186  
Frankfort, KY 40601

AA Statement 2 of 3.

**RE: HB 423 SCS 1 - AN ACT relating to prior authorization.**

Dear Mrs. Allen:

Judicial Form Retirement System (JFRS) has examined the SCS 1 version of **HB 423**. After review, we do not believe this version will have change the previous actuarial analysis provided by JFRS on March 5, 2025 with regards the GA Version of HB 423 (BR 278).

As a result, we have not requested any further actuarial analysis of **HB 423 SCS 1** by the Systems' independent actuary. Please let me know if you have any questions regarding our analysis.

Sincerely,

Bo Cracraft, Executive Director



# JUDICIAL FORM RETIREMENT SYSTEM

JUDICIAL RETIREMENT PLAN | LEGISLATORS RETIREMENT PLAN

Daniel Venters, Chairman  
Board of Trustees

Bo Cracraft  
Executive Director

March 5, 2025

Mrs. Maurya Allen  
Deputy Director's Office  
Legislative Research Commission  
Capitol Annex, Room 186  
Frankfort, KY 40601

AA Statement 2 of 3.

**RE: HB 423 GA - AN ACT relating to prior authorization.**

Dear Mrs. Allen:

Judicial Form Retirement System (JFRS) has examined the GA version of **HB 423**. After review, we do not believe this version will change the previous actuarial analysis provided by JFRS on February 28 2025 with regards the HB 423 (BR 278) – HCS 1.

As a result, we have not requested any further actuarial analysis of **HB 423 GA** by the Systems' independent actuary. Please let me know if you have any questions regarding our analysis.

Sincerely,

Bo Cracraft, Executive Director



# JUDICIAL FORM RETIREMENT SYSTEM

JUDICIAL RETIREMENT PLAN | LEGISLATORS RETIREMENT PLAN

Daniel Venters, Chairman  
Board of Trustees

Bo Cracraft  
Executive Director

February 28, 2025

Mrs. Maurya Allen  
Deputy Director's Office  
Legislative Research Commission  
Capitol Annex, Room 186  
Frankfort, KY 40601

AA Statement 2 of 3.

**RE: HB 423 HCS 1 - AN ACT relating to prior authorization.**

Dear Mrs. Allen:

Judicial Form Retirement System (JFRS) has examined the HCS 1 version of **HB 423**. After review, we do not believe this version will change the previous actuarial analysis provided by JFRS on February 18, 2025 with regards the HB 423 (BR 278).

As a result, we have not requested any further actuarial analysis of **HB 423 HCS 1** by the Systems' independent actuary. Please let me know if you have any questions regarding our analysis.

Sincerely,

Bo Cracraft, Executive Director



# JUDICIAL FORM RETIREMENT SYSTEM

JUDICIAL RETIREMENT PLAN | LEGISLATORS RETIREMENT PLAN

Daniel Venters, Chairman  
Board of Trustees

Bo Cracraft  
Executive Director

February 18, 2025

Mrs. Maurya Allen  
Deputy Director's Office  
Legislative Research Commission  
Capitol Annex, Room 186  
Frankfort, KY 40601

AA Statement 2 of 3.

**RE: HB 423 (BR 278) - AN ACT relating to prior authorization.**

Dear Mrs. Allen:

**HB 423 (BR 278)** creates new sections of KRS 304.17A-600 to 304.17A-633 to define terms; prohibit insurers of health benefit plans from requiring prior authorization for a health care service for which the provider has an exemption; require insurers of health benefit plans to establish a program under which participating providers may qualify for exemptions from prior authorization; establish mandatory and permitted provisions of an insurer's prior authorization exemption program; establish requirements for sending forms and notices; require the commissioner of the Department of Insurance to submit an annual report relating to prior authorization, provide a detailed briefing upon request, and promulgate administrative regulations; amend KRS 304.17A-605 to conform; amend KRS 304.17A-611 to prohibit conducting a retrospective review that is based solely on a participating provider having a prior authorization exemption; provide that certain utilization review timeframes do not apply to retrospective reviews conducted for the purposes of determining eligibility for a prior authorization exemption; create a new section of KRS Chapter 205 to require the commissioner of the Department for Medicaid Services to submit an annual report relating to prior authorization, provide a detailed briefing upon request, and promulgate administrative regulations; apply the provisions to contracts delivered, entered, renewed, extended, or amended on or after January 1, 2027; EFFECTIVE, in part, January 1, 2026, and January 1, 2027.

Staff of the Judicial Form Retirement System (JFRS) has reviewed **HB 423 (BR 278)** and determined it would not materially increase or decrease benefits, or increase or decrease participation in benefits, or change the current actuarial liability of either plan administered by JFRS. The requirements outlined in the legislation could cause an increase to premiums for insurance policies provided through JFRS, but that is not easily measurable at this time.

In compliance with KRS 6.350(2)(c), the Judicial Form Retirement Systems (the agency in charge with the administration of JRP and LRP) certifies the following:

1. The estimated number of participants potentially affected, as of June 30, 2024, are 1,012 individuals participating in JRP or LRP.
2. There is no estimated change in benefits.
3. There is no estimated change to current employer costs; however, if the inclusion of new health care regulations and exemptions to prior authorization as outlined in the legislation resulted in increased insurance premiums, there could be an increase in employer cost.
4. There is no estimated change to administrative expenses.



We have not requested any further actuarial analysis of **HB 423 (BR 278)** by the Systems' independent actuary. Please let me know if you have any questions regarding this analysis.

Sincerely,

A handwritten signature in black ink, appearing to read "Bo Cracraft". The signature is written in a cursive, flowing style.

Bo Cracraft, Executive Director



# TEACHERS' RETIREMENT SYSTEM

## of the State of Kentucky

**GARY L. HARBIN, CPA**  
*Executive Secretary*

**ROBERT B. BARNES, JD**  
*Deputy Executive Secretary*  
*Operations and General Counsel*

**J. ERIC WAMPLER, JD**  
*Deputy Executive Secretary*  
*Finance and Administration*

March 24, 2025

AA Statement 3 of 3.

Maurya Allen  
Office of Special Projects  
Legislative Research Commission  
Capitol Annex, Room 39  
Frankfort, KY 40601

RE: House Bill 423 GA / SCS 1 (2025 RS BR 278)

Dear Ms. Allen:

25 RS HB 423 / SCS 1, an act relating to prior authorization, would create new sections of KRS 304.17A-600 to 304.17A-633 to define terms; prohibit insurers of health benefit plans from requiring prior authorization for a health care service for which the provider has an exemption; require insurers of health benefit plans to establish a program under which participating providers may qualify for exemptions from prior authorization; establish mandatory and permitted provisions of an insurer's prior authorization exemption program; establish requirements for sending forms and notices; require the commissioner of the Department of Insurance to submit an annual report relating to prior authorization, provide a detailed briefing upon request, and promulgate administrative regulations; amend KRS 304.17A-605 to conform; amend KRS 304.17A-611 to prohibit conducting a retrospective review that is based solely on a participating provider having a prior authorization exemption; provide that certain utilization review timeframes do not apply to retrospective reviews conducted for the purposes of determining eligibility for a prior authorization exemption; create a new section of KRS Chapter 205 to require the commissioner of the Department for Medicaid Services to submit an annual report relating to prior authorization, provide a detailed briefing upon request, and promulgate administrative regulations; apply the provisions to contracts delivered, entered, renewed, extended, or amended on or after January 1, 2027; effective, in part, January 1, 2026, and January 1, 2027. The Senate Committee Substitute would retain original provisions but would also allow the commissioners of the Department of Insurance and the Department for Medicaid Services to include the reason or reasons for prior authorization denials in the reports submitted to the Legislative Research Commission.

25 RS HB 423 / SCS 1 would not materially increase or decrease retirement benefits or increase or decrease participation in benefits. 25 RS HB 423 GA should not change the actuarial liability of the system as the system. The bill would mandate additional insurance coverage which would likely increase somewhat the cost of the plans available from TRS.

TRS certifies, in compliance with KRS 6.350(2)(c), as follows:

1. There are approximately 140,000 members of TRS, of which approximately 58,000 are retirees.
2. There is no material increase or decrease in benefits, or participation in benefits other than the increased coverage as described above.
3. There is could be some increase in in employer health insurance cost with the increased coverage.
4. There is no estimated increase in administrative costs.

Please let me know if you have any questions regarding this analysis.

Sincerely,

A handwritten signature in black ink, appearing to read 'R. Barnes', with a long horizontal flourish extending to the right.

Robert B. Barnes  
Deputy Executive Secretary and  
General Counsel



# TEACHERS' RETIREMENT SYSTEM

## of the State of Kentucky

**GARY L. HARBIN, CPA**  
*Executive Secretary*

**ROBERT B. BARNES, JD**  
*Deputy Executive Secretary*  
*Operations and General Counsel*

**J. ERIC WAMPLER, JD**  
*Deputy Executive Secretary*  
*Finance and Administration*

March 4, 2025

AA Statement 3 of 3.

Maurya Allen  
Office of Special Projects  
Legislative Research Commission  
Capitol Annex, Room 39  
Frankfort, KY 40601

RE: House Bill 423 GA (2025 RS BR 278)

Dear Ms. Allen:

25 RS HB 423 GA, an act relating to prior authorization, would create new sections of KRS 304.17A-600 to 304.17A-633 to define terms; prohibit insurers of health benefit plans from requiring prior authorization for a health care service for which the provider has an exemption; require insurers of health benefit plans to establish a program under which participating providers may qualify for exemptions from prior authorization; establish mandatory and permitted provisions of an insurer's prior authorization exemption program; establish requirements for sending forms and notices; require the commissioner of the Department of Insurance to submit an annual report relating to prior authorization, provide a detailed briefing upon request, and promulgate administrative regulations; amend KRS 304.17A-605 to conform; amend KRS 304.17A-611 to prohibit conducting a retrospective review that is based solely on a participating provider having a prior authorization exemption; provide that certain utilization review timeframes do not apply to retrospective reviews conducted for the purposes of determining eligibility for a prior authorization exemption; create a new section of KRS Chapter 205 to require the commissioner of the Department for Medicaid Services to submit an annual report relating to prior authorization, provide a detailed briefing upon request, and promulgate administrative regulations; apply the provisions to contracts delivered, entered, renewed, extended, or amended on or after January 1, 2027; EFFECTIVE, in part, January 1, 2026, and January 1, 2027.

25 RS HB 423 GA would not materially increase or decrease retirement benefits or increase or decrease participation in benefits. 25 RS HB 423 GA should not change the actuarial liability of the system as the system. The bill would mandate additional insurance coverage which would likely increase somewhat the insurance premiums for plans available from TRS.

TRS certifies, in compliance with KRS 6.350(2)(c), as follows:

1. There are approximately 140,000 members of TRS, of which approximately 58,000 are retirees.
2. There is no increase or decrease in benefits, or participation in benefits.
3. There is no estimated increase in employer cost.
4. There is no estimated increase in administrative costs.

Please let me know if you have any questions regarding this analysis.

Sincerely,

A handwritten signature in black ink, appearing to read "R. Barnes", with a long horizontal flourish extending to the right.

Robert B. Barnes  
Deputy Executive Secretary and  
General Counsel