November 29, 2017

Industrial Commission of Arizona
c/o Jacqueline Kurtz
800 W Washington
Phoenix, AZ 85007

Re: ODG Guidelines Comment

Mrs. Kurth,

Please accept this letter, generated on behalf of the City of Surprise, as a public comment related to potential modification of A.A.C. R20-5-1301. On July 1, 2017, the City transitioned to a self-insured/self-administered workers' compensation program. This transition has inherently increased our interest and awareness related to medical treatment effectiveness, as it relates both to general employee wellness and cost-containment.

Similar to any responsible employer, the City recognizes that our employees are our greatest asset and the health and well-being of these employees is a paramount responsibility. The implementation and continued acceptance of updates offered via the Official Disability Guidelines (ODG), by the ICA will greatly benefit those responsible for administration of workers' compensation programs. Specifically, the ability to draw upon proven, evidence-based medical outcomes, will allow for both accountability on behalf of providers and serve as a valuable resource for those processing claims. It is my belief that the adoption and adherence to these guidelines will not only improve recovery time and outcomes; but, mitigate excessive or unnecessary medical procedures or treatment.

With the ever-changing medical industry, it is important to adopt globally-proven techniques and procedures, as opposed to operating in silos. The expeditious recovery of our injured workers should be the foundational goal of all employers. It is my belief that the use of ODG will provide a solid framework geared toward top-tier service for the injured worker, and improve return-to-work efforts. Should you have any questions or concerns, related to my comments, please feel free to contact me.

Sincerely,

Brian Carmichael
Senior Risk Manager
Brian.carmichael@surpriseaz.gov