



Property Casualty Insurers

Association of America

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AVP, Workers Compensation

November 28, 2017

Industrial Commission of Arizona  
800 West Washington St.  
Phoenix, AZ 85007  
c/o Jacqueline Kurth, Medical Resource Office  
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**RE: Proposed Expanded Applicability of the Official Disability Guidelines  
A.A.C. R20-5 Article 13 Treatment Guidelines  
Public Hearing: November 30, 2017**

Dear Members of the Industrial Commission of Arizona,

Property Casualty Insurers Association of America (PCI) respectfully submits the following comments to the proposal to modify or change the applicability of the adopted treatment guidelines as described in subsection B of A.A.C. R20-5-1301 Treatment Guidelines.

Property Casualty Insurers Association of America (PCI) is a trade association representing over 1000 property and casualty insurance companies. PCI members write over \$220 billion in annual premium including 35% of the commercial insurance market and 37% of the private workers compensation insurance market.

PCI submits the following comments for consideration.

**PCI supports the expansion of the applicability of the adopted evidence-based treatment guidelines to all body parts and medical conditions addressed by the guidelines.**

**1. Expansion of applicability of evidence-based treatment guidelines will improve medical treatment for injured workers.**

Evidence-based medicine guidelines prioritize treatment options based on medical research that examines efficacy of specific treatments. Treatments with proven efficacy supported by high quality medical research are classified as recommended treatments. Injured workers who receive treatment with proven efficacy tend to achieve better return-to-work and health outcomes since there is reduced risk of receiving ineffective treatments which may delay return-to-work or impede achievement of optimal health outcomes. Injured workers have access to treatments other than the recommended treatments through documentation of medical necessity of the other treatments.

**2. Expansion of applicability of evidence-based treatment guidelines will make treatment and claims processing more efficient and cost effective.**

Utilization of the same comprehensive and up-to-date evidence-based treatment guidelines by health care providers creates efficiencies in the delivery of effective health care and claims processing by requiring the stakeholders to use the same authoritative source in discussing treatment options.

Currently, there is some confusion on how best to resolve treatment issues for injured workers since Arizona only utilizes evidence-based medicine treatment guidelines for treatment of chronic pain and prescription of opioids. When addressing treatment disputes some health care providers may want to rely on personal clinical experience or treatment guidelines that are not evidence-based while payors may want to rely on historical claims experience or medical opinions that may or may not be based on evidence-based medicine. By applying adopted evidence-based treatment guidelines to all body parts and work-related medical conditions, health care providers can easily make treatment recommendations that are supported by high-quality medical research and payors can identify and approve treatments with proven effectiveness. These efficiencies result in timely delivery of appropriate medical care and better return-to-work and health outcomes.

**3. Expansion of applicability of evidence-based treatment guidelines will adequately cover the body parts or conditions.**

The adopted evidence-based medical treatment guidelines are comprehensive with regards to work-related injuries and illnesses and cover 99% of work-related medical costs. In addition, the adopted guidelines are updated frequently in order to keep up with published medical research and new treatments.

Thank you for considering these comments.

Respectfully submitted,



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