

**From:** [Timothy Spooner](#)  
**To:** [MRO](#)  
**Subject:** Specialty Networks  
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**Attachments:** [image001.png](#)

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Jacqueline Kurth,

I am writing to support the proposed language changes in ICA code, specifically paragraph 5.

The Arizona Industrial Commission and the Workmen's Compensation system is set up to provide services for injured workers and pay fees to providers that provide them.

Why have rogue organizations gained a foothold into our fee schedule? Very sneakily! As a long time provider, I did not fully understand the scourge that started many years ago. Now, these organizations take greater than 60% of the fees for their own gain.

Who loses?

Workers. Providers need to increase volume to offset losses. A poor business plan at best. But the worker truly suffers. These contracts are taken by less experienced therapists and businesses in order to stay in business but their ineffectiveness drives up the overall costs.

Employers. They are being swindled. Their workers are receiving sub care which costs them more in time and productivity.

Providers. These organizations are large and threaten the small providers with collusion if we band together, yet they are allowed to strong arm employers and the system. Providers want to take care of our communities in exchange for the WC ICA fee schedule. Get these middle men out!

Who wins.

Someone in Florida. Does that really help Arizona and its workers?

The medical community is a fragmented group by nature and cannot band together to legally fight these behemoths. I implore you to act swiftly and strongly to make this right with Arizona and its people—workers and providers alike.

Thank you for your time,

**Timothy A Spooner, PT, FAFS**

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