

From: [Jamie Miller](#)
To: [MRO](#)
Subject: Industrial Commission of Arizona to change the 2017/2018 Physicians' and Pharmaceutical fee schedule
Date: Thursday, May 11, 2017 9:30:38 AM

It has come to my attention that there is a proposal before the Industrial Commission of Arizona to change the 2017/2018 Physicians' and Pharmaceutical fee schedule. Please consider these comments before ruling.

Specialty Networks need regulation. Both in Arizona and nationally the problem of networks taking advantage of injured workers has curtailed the ability of physical therapists and physicians to provide quality care. Being involved in the conversations around controlling health care costs, the general agreement is that access to quality care is a priority for all parties involved. No one wants to admit that limiting access to care, or providing bad care, although less expensive, is a solution. There is minimal value add from such networks to the care of the worker or to the worker compensation process that warrants such exorbitant fees. When specialty networks get involved, and want a piece of the pie, more and more we see that those who suffer the most are patients and providers. Providers can't financially support their practices, and drop out of contract, and are held "hostage" to accept these rates or lose the referrals. Patients have fewer options, and are relegated to low-cost, volume-based care.

The quality of therapy can also be negatively affected; delaying and interfering with the care of the Arizona injured worker to no one's benefit except the network. Therapists spend less direct care time, use more therapy extenders or passive modalities. In this case the employer/payer gets less therapy for their buck in the end because of the high administrative fees.

In conclusion I am urging the ICA to take action to deter the practice of these non-legitimate specialty networks. We need to keep in mind, the human, the patient, and in fact the bottom line – the worker.

Thank you for your consideration,

Jamie

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