

May 11, 2017

Jacqueline Kurth

Medical Resource Office Industrial Commission of Arizona

Via Email: Jacqueline.kurth@azica.gov

Re: Arizona Worker's Compensation Medical Fee Schedule

Dear Ms. Kurth,

Thank you and the Commission for your recent review of the regulatory language affecting workers' compensation medical provider payments and the involvement of third party administrators, (TPA's) who are retaining portions of those medical payments.

Our company is a small privately owned practice and this has made negotiations very difficult with larger TPA's and patients are suffering as a result. TPA's in an attempt to "line their pockets" will direct patients to companies that have discounted fee schedules. This in turn may not be in the best interest of the patient as they often do not understand that they have options when it comes to choosing who will be providing their care. As a result of these TPA's favored fee schedules our company has also seen a reduction in referrals through said TPA's and this has been detrimental to our small local business.

I have been employed as a Physical Therapist in this state since 2011 during which time our practice has been involved with multiple TPA's. During my almost 6 years as a therapist I have noticed an alarming trend of declining reimbursements throughout the medical field but more specifically in the workers compensation portion of our treatments. In addition to issues pertaining to payment, TPA's also frequently require additional paperwork and "red tape" that can both delay patient care and limit it all together. These limitations delay patients from returning to productive work and provide continued limitations for these patients in their daily lives. This is not helping to control the cost for employers nor assisting employees with their personal financial concerns. Employers of an injured worker take a loss without an employee to complete their companies work. An employee on short term disability is making a lesser wage during their time away from work and delaying these processes with the "red tape" involved with TPA's ultimately costs the economy money.

I can say in my experience that we have worked with both companies that are transparent about their fees and those that are not. The companies that have been transparent about their fees in my experience have been more concerned about patient care and are frequently faster with response times regarding starting patients into treatment and with continued authorization over the course of treatment. The TPA's that have been less than upfront about their fee schedules frequently delay authorization for continued care of patients and even with the initial authorization to start treatment.

Larger TPA's have also added additional work for our clinic, both for clinicians and our support staff as we are frequently required to complete redundant paperwork for the TPA's specialized form to provide information that is already documented. This in turn increases our cost as a clinic with additional clinician hours, staff hours and office resources.

Sincerely,

A handwritten signature in black ink, appearing to read "Matthew Jaspers, PT, DPT". The signature is written in a cursive style with a long horizontal stroke extending to the right.

Matthew Jaspers, PT, DPT

Physical Therapist

Arizona Sports Physical Therapy