



May 11, 2017

Dear Members of the Industrial Commission of Arizona,

Please accept the written comments below from OrthoArizona in response to the draft 2017-2018 Industrial Commission of Arizona's Fee Schedule recommendations:

OrthoArizona is committed to providing the highest level of orthopedic care. We take pride in using evidence-based orthopedic medicine that demonstrates measurable outcomes and leads to the quality that our community deserves. We have 65 premier orthopedic specialists, including spine, sports medicine, hand and wrist, and foot ankle subspecialists, conveniently located throughout Maricopa County. While keeping patients' care first in everything we do, OrthoArizona understands the demand for finding and utilizing an orthopedic provider who can provide care for the chronic problems, the acute injuries as well as the complex, specialized services due to a catastrophic injury.

Our providers take pride in the long-standing relationships and reputation they have built in the industrial community and with members of the Industrial Commission of Arizona. We remain committed to same-day appointments, availability of work status reports at the time of visit, and timely written reports to ensure ease of use and open communication for all those involved in managing the care of an Arizona injured worker.

With the above said, please recognize that we understand and respect the need to transition to a RBRVS reimbursement methodology. Furthermore, we fully support and agree with the language pertaining to "phantom" networks. As we understand the goal of the Commission's transition to the RBRVS methodology was to be budget neutral, we believe the current draft is not budget neutral and, in fact, has a negative impact on overall reimbursements of 25-40%. In keeping with the original stated goal of the Industrial Commission of Arizona, we respectfully request a review and modification to the conversion factor that truly achieves budget neutrality. We would welcome the opportunity to provide further consultation regarding the RBRVS methodology and conversion factor, if desired, as well as work in partnership with the Commission towards establishing an electronic repository for provider documents leading to a simplification of the administrative burden. Also, we would respectfully request objective guidelines be established for "case management" codes leading towards ease of use and reimbursement. Lastly, OrthoArizona is ready, willing and able to explore alternative payment methodologies with the Commission and would welcome the opportunity to future discussions on this topic.



We sincerely thank the Commissioner and the Members of the Industrial Commission of Arizona for their extensive time, research and due diligence in drafting this new 2017-2018 Fee Schedule and stand willing and ready to continue to provide leadership and excellent care to the workers compensation community of Arizona.

Respectfully,

John K. Bradway, M.D.
President

David M. Ott, M.D.
Vice President

John Kinna
CEO

