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August 11, 2020

Medical Resource Office
Industrial Commission of Arizona
800 West Washington Street
Phoenix, AZ 85007

Re: Public Comment, Invalid Workers' Compensation PPO Contract Use

To Whom It May Concern:

Thank you for the opportunity to comment on the above matter.


I have worked in the Medical Office/Medical Billing Industry for over 30 years. In 2007, I became aware of Third-Party Pricing Networks (CCN/First Health/Coventry/PHCS/MultiPlan/HMA etc...) 'absorbing' other Third-Party Pricing Networks and 'converting' outdated contracts by mailing a 'notice' that the *new Network* 'acquired' the old PPO contract and that the fee schedule is now replaced by the *new Network*. I argued the matter and subsequently, all claims were reprocessed according to the original contract rate.

In 2016, I worked for a Plastic Surgeon in Phoenix who treated a patient injured on the job and the claims were 'priced' by Coventry Workers' Compensation PPO and reduced (dramatically). I contacted the adjustor and advised him I needed a copy of the contract. He deferred me to the 'pricing network' phone number on the Explanation of Payment. I called the number and after an hour of being transferred to different 'off shore' departments, obtained a reference number for the call. I was directed to request a copy of the contract by faxing the Reference number, an original signature from the provider and Tax ID on the Fax Cover Sheet. After numerous failed attempts due to busy signal, my fax went through with confirmation. Several weeks later, a contract came by USPS however, the Corporation name and address were incorrect and the contract was from 2006, I believe. The invalid PPO contract was forwarded to Renee England at your facility. She communicated with the adjustor and the underpaid claims were all reprocessed/paid according to the appropriate ICA Fee Schedule. The underpayments totaled close to \$60,000.00.

More recently, I happened to be working for the same physician and came across another Insurance Company utilizing an invalid PPO contract. What troubles me most is that this scenario has been playing out for over 13 years and needs to stop. Millions of dollars have been stolen from physicians by these Third-Party Pricing Networks utilizing invalid PPO contracts.

Thankfully, the new language requiring the insurance company to produce a valid contract should help matters.

Kind regards,



Linda R. McKeever