October 13, 2011

John Metcalf
Administrator and Chair
Division of Workers Compensation
Workers Compensation Advisory Council
Wisconsin Department of Workforce Development
201 E. Washington Avenue
Madison WI 53702

Subject: Provider Comments on "Agreed to" Bill Proposal

Dear Mr. Metcalf:

The Wisconsin Chiropractic Association, Wisconsin Hospital Association, Wisconsin Medical Society, and the Wisconsin Physical Therapy Association, the four health care provider liaisons to the Workers Compensation Advisory Council ("WCAC"), are very concerned with a proposal discussed by the WCAC at the end of their October 10, 2011, meeting. According to the presentation of the provider fee portion of the proposal, the "agreed to" bill would:

- Reduce the maximum fee for health care services provided to injured workers from 1.4 standard deviations to 1.2 standard deviations above the mean charge.
- Establish a committee of the WCAC to audit the certified databases for compliance with program requirements, *but only after the implementation of the reduced fee*.
- Increase the reduced fees to 1.3 standard deviations above the mean if the audit does not commence within six months of the bill's enactment.

Audit of certified databases must precede any change in reimbursement. The provider liaison organizations strongly oppose reducing provider fees for services provided to injured workers. As we have discussed many times, the Workers Compensation insurance reimbursement system is an inefficient paper-based system that is frustrating for participating providers. Any reduction in fees could reduce access to the excellent care currently enjoyed by injured workers in Wisconsin. But reducing fees using databases that do not appear to meet program requirements and that providers do not trust does not make sense. It sends the message to providers that the WCAC is unconcerned that insurers might not reimburse providers at the levels established by the WCAC.

We respectfully ask the WCAC to amend the current proposal to audit the certified databases *before* implementing any fee reduction.

The provider liaison organizations remain available to work with the WCAC to move our system forward.

Sincerely,

Russ Leonard
Executive Director
Wisconsin Chiropractic Association

Mark Grapentine, JD
Senior Vice President
Wisconsin Medical Society

Laura Leitch
Senior Vice President and General Counsel
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Lynn Steffes, PT, DPT
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