



July 18, 2018

MEMORANDUM

**TO: Director Mindy Montgomery
Idaho State Industrial Commission**

**FROM: Steve Wilson, President
Idaho Chamber Alliance
CEO – Coeur d’ Alene Chamber of Commerce**

SUBJECT: Negotiated Rulemaking – IDAPA 17.0209.1801 Medical Fees

Thank you for taking time to read this letter and consider our views. I am writing on behalf of Idaho’s chambers of commerce, collectively the Idaho Chamber Alliance who represent over 10,000 employers across Idaho who employ hundreds of thousands of Idahoans. We want to express our opposition to the above referenced rulemaking docket and the proposal to increase medical provider reimbursement in worker compensation cases.

Idaho’s chambers of commerce are concerned about any increase in medical fees under Idaho’s workers’ compensation system. Our economy is improving but the health care sector remains overly expensive and seemingly increasing. We do not support the negotiated rulemaking proposal referenced above. Idaho’s chambers believe this would result in continued increases in health care related fields specifically and become the responsibility of employers who pay these workers’ compensation rates. We strongly believe that no increase in medical fees is merited in 2018, or for that matter, in the immediate future.

Accordingly, the Idaho Chamber Alliance is advocating that all workers’ compensation medical fees remain at current levels. Increased fee levels will inflate premium rates paid by employers and directly impact a businesses’ ability to hold down indirect costs of doing business. This will in turn diminish employers’ ability to continue to provide high paying jobs with great benefits here in Idaho.

It is the Chamber Alliance’s belief this proposal comes at a time when health care costs continue to rise and employee insurance coverage is unpredictable. Now is not the time for government to authorize increases for workers compensation medical fees.

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