



July 10, 2018

Mindy Montgomery, Director
Idaho Industrial Commission
700 S Clearwater Lane
PO Box 83720
Boise, ID 83720

Re: IDAPA 17
17.02.09 – MEDICAL FEES

Ms. Montgomery,

Each year the Industrial Commission reviews the issue of fair compensation for Idaho providers in the workers compensation payment system and each of the past five years the fee schedule has been frozen at current rates. This action equates to lower compensation to providers due to stagnant reimbursement along with rising medical costs.

Reliance on national data for these decisions doesn't take into account the primary care shortage in the state of Idaho or the declining reliance by provider groups on CPT compensation, due to newer compensation methodologies being used, across the nation.

Primary Health Medical Group is in favor of the recommendation to divert some of the reimbursement rates for radiology, laboratory and procedures to Evaluation & Management services. This would move toward our historic support of using a more universal conversion factor for all services that are reimbursed under the RVU system, as Medicare originally intended when designing this payment methodology.

We are willing to work with the Industrial Commission and other stakeholders to evaluate and make recommendations on changes to conversion factors or even evaluating other payment methodologies if desired. Please feel free to contact us if this would be helpful.

Thank you for your consideration.

Sincerely,


Robyn Crosby
Manager, Payer Relations