

**ORIGINAL: 2542**

**Gelnett, Wanda B.**

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**From:** Wunsch, Eileen [ewunsch@state.pa.us]  
**Sent:** Thursday, June 29, 2006 7:29 AM  
**To:** Henneman, Karla  
**Cc:** Kupchinsky, John; Kuzma, Thomas J. (GC-LI); Howell, Thomas P. (GC-LI)  
**Subject:** FW: Private Practice SIG

KARLA,

This is a public comment that needs to be printed and logged in. Thanks.

Eileen K. Wunsch, MS, CPIW, ARM  
Chief, Health Care Services Review  
Bureau of Workers Compensation  
Department of Labor & Industry  
1171 South Cameron Street  
Harrisburg, PA 17104  
Phone: 717 772-1912  
FAX: 717 772-1919  
ewunsch@state.pa.us

-----Original Message-----

**From:** LI, BWC-Administrative Division  
**Sent:** Thursday, June 29, 2006 7:15 AM  
**To:** Wunsch, Eileen  
**Subject:** FW: Private Practice SIG

Eileen,

This came into the Admin Generic Mail Box. How to respond.

Thank you.

-----Original Message-----

**From:** Horne, Sue D. [mailto:hornesd@upmc.edu]  
**Sent:** Monday, June 26, 2006 11:10 AM  
**To:** ra-li-bwc-administra@state.pa.us  
**Cc:** Rockar, Paul; D'Andrea, Brendan; Rovito, Dino; McLaughlin, Vicki  
**Subject:** RE: Private Practice SIG

As a Billing Manager for a Certified Rehab Agency, I would like to comment on the Proposed Rulemaking, Department of Labor and Industry [34 PA. Code Ch. 127), Medical Cost Containment [36 Pa.B. 2913] [Saturday, June 10, 2006] section 127.201 (relating to medical bills--standard forms). Because rehab services including physical therapy and

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occupational therapy to work comp clients does extend beyond 90 days in many cases, I am concerned that payers will withhold payment for services extending beyond 90 days since the bill will not be submitted within 90 days of the employee's first date of treatment as noted in the proposed ruling. We have also treated patients in the past who neglected to inform us that their injury was work related until a later date when they request that we resubmit our bill to a new payer, the work comp carrier. Also, as noted in the proposed change, providers are required to waive their right to proceed against the insurer or claimant for payment of bills, when they fail to request payment within 90 days of the employee's first date of treatment. I suspect that some payers may consider this ruling as an opportunity to withhold payment for our services.

Also, the intent of proposed amendment of 127.211 (relating to balance billing prohibited) is to further prohibit providers from billing patients for treatment regarding reported work injuries unless the provider has submitted a written denial of liability. I assume the written denial of liability is the denial from the work comp payer. Where and to whom is the provider to submit this document?

I am concerned too that the proposed amendment to 127.260 (relating to fee review adjudications) to delete the requirement that the hearing officer issue decisions and orders within 90 days, may delay the processing of claims for payment. How long will the hearing officer have to issue a decision?

I appreciate your attention to the above concerns.

Sue Horne  
Billing Manager  
Centers for Rehab Services  
1300 Oxford Drive, Suite 1F  
Bethel Park, PA 15102  
Phone: 412-851-2136  
Fax: 412-851-2134

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-----Original Message-----

From: Rockar, Paul

Sent: Friday, June 16, 2006 9:20 AM

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To: D'Andrea, Brendan; Rovito, Dino; Horne, Sue D.; McLaughlin, Vicki  
Subject: FW: Private Practice SIG

The first document is the proposed WC regs. The second document indicates what we are allowed to charge for copies of records, etc.

-----Original Message-----

From: [mlb@telerama.com](mailto:mlb@telerama.com) [<mailto:mlb@telerama.com>]

Sent: Friday, June 16, 2006 8:50 AM

To: undisclosed-recipients

Subject: Private Practice SIG

Hello, Everyone

I hope your enjoying the summer so far! The attachments are for your information regarding the

- 1) WC Proposed reg notice and the
- 2) PA allowable charges for medical records for 2006.

Hope the information helps you in your practice or Future practice. The information was forwarded by Sandy McCuen and is available on the ppta web page. Sincerely, Maery Lee Beach, Chair Private Practice SIG