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July 4, 2006

Bureau of Workers' Compensation
Attention: Eileen Wunsch
PO Box 15121
Harrisburg, PA 17105-5121

Fax (717) 772-1900

Re: Comments/concerns regarding Proposed Medical Cost Containment
Regulations

Dear Ms. Wunsch,

Please accept this letter regarding my questions/concerns/objections relative to the recently proposed Medical Cost Containment Regulations.

- 127.803 The proposed regulations do not specify the manner in which the Bureau will assign requests to UROs. Will this be on a random or rotational basis? Will the files be distributed equally? Please advise.
- 127.811 I have some concerns regarding allowing insurers to request a review of "all treatment" rendered to an employee. Please elaborate on this issue further. This may be a logistical nightmare for the URO's and may prove to be more costly in the long run for the paying party. Additionally, this process may serve to be more of a "fishing" expedition by the insurers and may, in turn, hurt the injured worker and providers. Additionally, it is not practical to expect "consultation of the involved reviewers" without significant expense. Can the employee request a review of "all treatment"? If not, why not?
- 127.842 Please elaborate on this process. Can providers now submit a letter outlining their treatment plan? Can they do this for ALL reviews, or just precerts? If the PURs only have 10 days to submit records, are UROs permitted to call to request records (127.857)? What if the address was incorrect as provided by the requesting party resulting in a No Records Review. Without the ability to contact the PUR's office, the injured worker and the PUR would suffer unnecessarily.

Will there be different report formats for Precerts and Redeterminations?

127.865 Under the current regs, the URO's must keep files for 1 year from the date of determination. Will this change? I would assume that this rule must change if there are going to be redeterminations submitted to the same URO that was assigned to the original request?

Is there a way to make the reporting process more "stream-lined" and easier for the Reviewers to complete when doing redeterminations? If the Reviewers have less time to complete reports, they are likely to increase their rates if the process isn't "quick and painless".

127.856 Why aren't PURs allowed to submit peer-reviewed, independently funded studies to support their treatment?

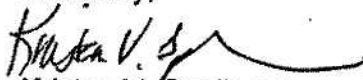
127.864 "Providers must also specifically reference generally accepted treatment protocols....." Should this be "Reviewers"?

127.871 Will the WCB also require that the insurer pay the URO for the reviews? Is there a mechanism to obtain payment when they fail to pay in a timely manner?

127.1051 Please address the exact mechanism for authorizing UROs/PROs. Will there be a minimum/maximum number of UROs? What will the determining factors be? Who will be making the decision to authorize the UROs? Will there be a "rolling" or "open" contracting process? If not, how will the process work when the URO's are reauthorized at different times/dates/years?

Thank you for the opportunity to submit this response to the proposed regulations. Your time and consideration is truly appreciated.

Sincerely,


Kristan V. Sagliocco
President
KVS Consulting Services

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