

ORIGINAL: 2542

DLB Services

3 Weaver Road, Reading, PA 19608
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July 5, 2006

Eileen Wunsch
Bureau of Workers' Compensation
1171 S. Cameron Street
Harrisburg, PA 17104

Fax to: 717-772-1900

Re: Proposed Rulemaking 34 PA Code Chapter 127, Subchapter E

Dear Ms. Wunsch:

I am submitting comments on behalf of DLB Services regarding the proposed regulations, which have recently been published.

The first concern is the timeframes involved with providers to submit their records. We feel this will lead to numerous "no records reviews", particularly since many times carriers indicate only a PO Box on the UR request, which most times is a billing office and they do not always seem to care. Fifteen days is not a lot of time for URO's to chase after billing companies to find out where our requests for records letter is sitting. Insurance carriers should be mandated to look at the records rather than the bill when indicating the address for the provider under review.

The timeframes that URO's have once records have been received is also of concern, especially in light of section 127.811, which could encompass copying records for numerous reviewers to review and review of possibly multiple reports for one review. Also, suggesting that reviewer consult with the other reviewers would be difficult as the majority of the qualified reviewers have 40 hour plus practices and to expect them to consult with one another regarding inconsistencies would be extremely difficult and most likely drive up the cost of the review.

We were hoping to see a mechanism in place regarding matching the board certification of the provider under review, particularly when they are no longer practicing within the scope of their board certification. When there is an OBGYN or Pathologist who is no longer practicing in that discipline, it seems there should be a mechanism in place to send these files out to a reviewer of like Specialty not board certification. These types of reviews result in determinations that are of little or no value to all involved.

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Lastly, the proposed contractual or bidding process is of concern, as there is no assurance that a contractual or bidding process would not favor a larger company.

We look forward to seeing you at the upcoming meeting and discussing these topics.

Sincerely,

A handwritten signature in black ink, appearing to read "Dee Beane". The signature is written in a cursive style with a large initial "D".

Dee Beane
President, DLB Services

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Fax

To: Eileen Wunsch **From:** Dee Beane

Fax: 717 772 1900 **Pages including cover:** 3

Phone: **Date:** 7/5/06

Re: Comments on proposed regulations

Urgent For Review Please Comment Please Reply Please Recycle

• Comments:

*I'll be attending Harrisburg meeting
on 7/11/06*

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