

July 10, 2006

Attn: Eileen Wunsch
Re: Comment Submission Guidelines

1. The number one concern from Allegheny Orthopaedics' billing department is (127.253). Application for fee review must contain copy of first bill sent to insurer. The original bill and print date is not saved in the computer as a document image that can be accessed again. The bill can of course be printed again but reflects the actual date the bill is being printed.

To comply with this proposed regulation all workers' compensation bills would be separated from self-pays and insurances for copying. This alone would be a tedious and time consuming task considering the volume. All copies would then be filed in paper charts for each patient. Charts would be overflowing with paperwork causing storage issues. When a fee review is filed the chart would be pulled to copy the original bill which would increase the time it takes in this already lengthy process.

2. Are there any provisions in regards to (127.201) billing within 90 days of date of service? Frequently a patient will treat conservatively for 3 months under private healthcare insurance, surgery is recommended, the patient then decides to pursue through worker's compensation. Another example would be when the patient has filed a claim but does not tell the provider until surgery is recommended.
3. In regards to (127.209) 3rd sentence "require that provider use EOR". Is "provider" the insurer (entity paying the bill)? If "provider" is referring to the physician can you please explain?
4. Proper proof of service not included on the back of fee review application (127.252). Will proof of service be a separate form that can or must be electronically filed?
5. Pre-certification (127.821). Will there be a specific form for providers to request pre-certification? What guidelines will there be for insurers to respond? Can insurers deny services for no pre-certification request?
6. What is USPS form 3817 proof of mailing?
7. Concerns and confusion about how or if the proposed fee schedule regulations will affect orthopaedic (HCFA 1500) reimbursements.

Sincerely,

Heather Guthrie, Manager Workers' Compensation
Allegheny Orthopaedic Associates

ORIGINAL: 2542

Gelnett, Wanda B.

From: Wunsch, Eileen [ewunsch@state.pa.us]
Sent: Tuesday, July 11, 2006 8:01 AM
To: Henneman, Karla
Cc: Kupchinsky, John; Kuzma, Thomas J. (GC-LI); Howell, Thomas P. (GC-LI)
Subject: FW: Comment Submission Guidelines

KARLA,

These need to printed, distributed and logged in. Thanks.

Eileen K. Wunsch, MS, CPIW, ARM
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-----Original Message-----

From: Heather Guthrie [mailto:HGUTHRIE@wpahs.org]
Sent: Monday, July 10, 2006 10:35 AM
To: ewunsch@state.pa.us
Subject: Comment Submission Guidelines

Please see the attached that was faxed earlier today.

Thank you,
Heather Guthrie

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**Allegheny
Orthopaedic
Associates**

ORIGINAL: 2542

Fax

To: Eileen Wunsch	From: HEATHER GUTHRIE
Fax: 717-772-1919	Pages: 2 Including cover
Phone:	Date: 7/12/2006
Re: Comment Submission Guidelines	CC:

Urgent **For Review** **Please Comment** **Please Reply** **Please Recycle**

● **Comments:**

Dear Eileen,

I hope it is not too late to submit these questions and concerns. I will also e-mail this to you. I'm just returning from vacation and I will be attending the meeting this Thursday. I'm sure these are the same concerns and questions many providers have. You may have already addressed some or all of the following.

Thank you,

Heather Guthrie