

ORIGINAL: 2542

Gelnett, Wanda B.

From: LI, BWC-Administrative Division [RA-LI-BWC-Administra@state.pa.us]
Sent: Tuesday, July 11, 2006 7:41 AM
To: Wunsch, Eileen; Kupchinsky, John; Kuzma, Thomas J. (GC-LI); Howell, Thomas P. (GC-LI)
Subject: Comments on Regs. from Karla

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

From: RCARPENT@GHS.GUTHRIE.ORG [<mailto:RCARPENT@GHS.GUTHRIE.ORG>]
Sent: Monday, July 10, 2006 4:26 PM
To: ra-li-bwc-administra@state.pa.us
Cc: MDANG@GHS.GUTHRIE.ORG; LSAGGIOM@GHS.GUTHRIE.ORG
Subject: Workers ' Compensation—Proposed Amendments to Chapter 127

Ms. Wunsch,

Please find attached comments on the Proposed Amendments to Chapter 127
Workers' Compensation Law.
Thank you for your consideration.

Rose Carpenter
Robert Packer Hospital
Patient Business Services
(570) 882-4358

(See attached file: PAComp_Comment.doc)

July 10, 2006

Eileen Wunsch, Chief
Health Care Services Review Division
Bureau of Workers' Compensation
Department of Labor and Industry
Chapter 127 Regulations--Comments
P. O. Box 15121
Harrisburg, PA 17105

Dear Ms. Wunsch,

I would like to submit the following comments on proposed changes to the Pennsylvania Workers' Compensation Law.

Section 127.117:

The current practice of using charge master service codes is very cumbersome; however it does provide a basis for determining whether we are being paid correctly. A change to the use of service descriptors will make it impossible to verify payments since we use the same description for many codes and these codes have different reimbursement rates.

Section 127.201

Many Workers' Comp claims are billed only after a claim has been denied by another insurance company. Since providers are at the mercy of insurance companies that do not process claims in a timely manner, the requirement that providers request payment within 90 days from the first date of treatment is not reasonable.

Section 127.851

Providers under review need sufficient time to submit medical records. A requirement to mail all requested medical records to the URO within 15 days of the postmark date of the URO's request is not sufficient time.

Thank you for your consideration of these comments.

Rose Carpenter
Financial Analyst
Robert Packer Hospital
Patient Business Services Department