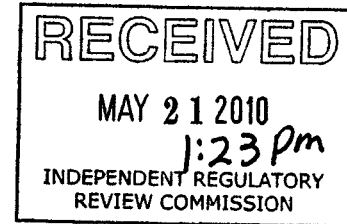


2826

Blackburn, Thomas

Subject: RE: comments

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

From: k_royal@concentra.com [mailto:k_royal@concentra.com]**Sent:** Friday, May 14, 2010 12:38 PM**To:** ST, CHIROPRACTIC**Subject:** comments

Hello,

Can you confirm if this email was received submitting comments on the rulemaking amendments to 49 PA.CODE CH. 5?

Thank you,

K

Dear Ms. McConnell,

It is commendable that Pennsylvania's State Board of Chiropractic seeks to improve the quality of care provided to injured workers while containing the costs associated with such. Concentra Peer Review Services ("CPR") has an interest in the promulgation of rules affecting certain utilization review services. In order to assist your department in this endeavor, CPR provides the following comments on the proposed amendments to the Pennsylvania Chiropractic Practice Act.

§ 5.56 Chiropractic Peer Review

In the amendments proposed, most notable is § 5.56 requiring that a chiropractor performing a chiropractic peer review be currently licensed in Pennsylvania and actively practice at least 20 hours a week. We hope that you will consider revising this requirement based on the burden it would impose and its restrictiveness and to provide the most current standards in the patients' best interests at the most effective cost-benefit point.

Undue burden

Same state licensure requirements places an undue burden on utilization review and peer review companies to locate sufficient numbers of same state licensed Reviewers/Advisors in all relevant specialties.

Overly restrictive

It is not necessary to require same state licensure in order to enforce quality of service and protect public from harm. Certainly, an active medical license is an appropriate qualification. However, given that quality utilization review Advisors and programs increasingly mandate guidance from nationally recognized, evidence based medical standards, a same state license is not a necessary qualification to provide these services.

Up-to-date Standards of Care

Health care standards were historically based on local standards and traditions as criteria to gauge quality and reasonableness of care. However, this is now an antiquated view in light of national standardization of practices and availability of information of technology. The desirable standard is to avoid isolated practices.

Increased health care costs


It is increasingly difficult to recruit and retain qualified chiropractors to perform a critical yet underappreciated aspect of medical care such as peer review services within workers compensation. Restricting the recruiting pool to local practitioners limits the work available to each Advisor, yet requires an increased number of Advisors over all. Recruiting and retaining local Advisors requires increasing remuneration and eventually increases the total burden of cost, which passes through to employers, states, and the general public.

Thank you for your consideration of these potential issues addressed in the draft rules. CPR welcomes the opportunity to participate in formulation or adaptation of regulations involving peer review and utilization review program.

5/18/2010

Regards,

K Royal, CIPP
Privacy and Security Officer
AVP, Regulatory Affairs

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