



## Western Occupational & Environmental Medical Association

A Component Society of the American College of Occupational and Environmental Medicine

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June 23, 2008

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### RE: WOEMA Position on Primary Treating Physician regulations

Dear Dr. Searcy,

The Western Occupational & Environmental Medical Association (WOEMA) would like to clarify its position on the proposed Primary Treating Physician regulations, and in particular the proposed changes to the PR-2 form.

First off, we appreciate the Division's continued efforts to make California's Workers' Compensation system more efficient and responsive. We agree that evidence-based medicine must undergird the delivery of care and that utilization review and other oversight vehicles serve an essential purpose. We also agree with the need for standardization in claims administration and medical service delivery, and that guidelines for reporting and documentation help to accomplish that standardization.

However, WOEMA remains concerned that the reporting and documentation process not become so burdensome that it encroaches on a clinician's ability to provide efficient, high-quality service to patients. The proposed changes to the PR-2 raise that concern, with the prospect that physicians will be frustrated in having to devote ever more resources to form completion, with no reimbursement mechanism in place to cover the added time.

WOEMA would surely be pleased to help develop such a payment mechanism, which we believe should be put in place at time of implementation. We would also welcome any efforts to track the effects of the added requirements to ensure that the administrative gains don't come at the expense of efficiency and effectiveness in the clinic.

As always, we at WOEMA appreciate the time and thoughtfulness you and your

colleagues dedicate to these issues. And as always, you and they should feel free to contact me if you have any questions about WOEMA's position.

Thank you for your consideration,

Sincerely,

A handwritten signature in black ink that reads "Steven C. Schumann MD". The signature is written in a cursive style.

Steven C. Schumann, MD  
Legislative Chair