

November 28, 2017

Ronald Rascia
General Counsel
Illinois Workers' Compensation Commission
Via Electronic Mail: Ronald.Rascia@Illinois.gov

Mr. Rascia,

On behalf of the members of the Illinois State Medical Society and Illinois Health and Hospital Association, we are writing to urge the Illinois Workers' Compensation Commission to implement the recommendation of the Medical Fee Advisory Board to increase reimbursements by 30 percent for six of the Evaluation and Management (E & M) codes on the Illinois Workers' Compensation Medical Fee Schedule. Ensuring access to quality medical care is essential to the health of our workers' compensation system in Illinois. The recommendation of the Medical Fee Advisory Board addresses issues that impair access-to-care for injured workers, which may in turn worsen their workplace injuries, delay their return-to-work, and ultimately contributes to increased costs for our workers' compensation system in Illinois.

E & M codes are the codes used for the reimbursement of office visits by a physician. It is during these visits that a physician is able to evaluate a work-related injury and set out a course of action in order to position that patient on the pathway to recovery and return to employment. However, if the reimbursements for E & M codes do not adequately cover the costs and labor of treating a workers' compensation patient, this forces physicians and facilities to reconsider whether they can treat injured workers. This has been a continuous concern in Illinois, especially since the Medical Fee Schedule reimbursements were drastically reduced in 2011.

In 2014, the Medical Fee Advisory Board also recommended an increase to E & M code reimbursements and this recommendation was implemented by the Workers' Compensation Commission. Unfortunately, that action has not rectified the barriers to access-to-care for injured workers' seeking medical services and the challenges to providing that care. For reference, a comparison of the 2015 reimbursements for the six E & M codes in Illinois with the average costs for the same codes in Iowa, Indiana, and Wisconsin, as reported by workers' compensation insurance carriers, reveals that Illinois medical professionals and facilities are receiving significantly less for the same care that is provided in these surrounding states (see chart below). For example, for code 99203, an evaluation of a new patient with a detailed history and exam with low complexity, Illinois physicians and facilities are reimbursed on average 32 to 69 percent less than in Iowa, Indiana, and Wisconsin.

We request that you share this letter with the members of the Workers' Compensation Commission, as well as the members of the Workers' Compensation Medical Fee Advisory Board.

Thank you for your consideration of this important matter, as we urge the Commission to implement the Medical Fee Advisory Board’s recommendation to increase reimbursements for the six Evaluation and Management codes.

Sincerely,



Erin O’Brien, Vice President,
State Legislative Affairs
Illinois State Medical Society



Dave Gross, Senior Vice President,
Government Relations
Illinois Health and Hospital Association

Comparison of Reimbursements for E & M Codes based on 2015 Data

Codes	Four Illinois Fee Schedule Regions				IL Average*	IA Average^	IN Average	WI Average
	IL01	IL02	IL03	IL04				
99203	\$124.65	\$121.40	\$111.21	\$108.14	\$116.35	\$164	\$162	\$240
99204	\$184.35	\$181.98	\$168.71	\$164.79	\$174.96	\$256	\$257	\$379
99205	\$227.41	\$224.63	\$206.08	\$204.41	\$215.63	\$313	\$293	\$425
99213	\$79.85	\$78.65	\$71.22	\$70.87	\$75.15	\$104	\$103	\$157
99214	\$117.88	\$116.61	\$104.52	\$104.80	\$110.95	\$159	\$158	\$243
99215	\$160.11	\$157.56	\$145.09	\$142.78	\$151.39	\$209	\$221	\$330

* Based on the average of all four professional Illinois Fee Schedule Regions as reported on the IWCC website.

^ Information for Iowa, Indiana, and Wisconsin based on data reported by workers’ compensation insurance carriers to the Workers’ Compensation Research Institute.