



February 28, 2018

Hon. Marguerite Quinn
Pennsylvania House of Representatives
129 Main Capitol
Harrisburg, Pennsylvania 17120

Re: NCOIL Worker's Compensation Committee Proposed Model Legislation

Dear Representative Quinn:

I am writing to follow up on our conversation about the proposed NCOIL model legislation regarding physician dispensing. On behalf of Concentra, I want to thank you again for your work on this important subject. Concentra believes that the draft legislation is an important step in the right direction, but would benefit from a few small changes in order to avoid unintended consequences, and to bring it in line with Pennsylvania's existing physician dispensing law.

As you know, Concentra is America's leading provider of occupational medicine. We treat one in every five individuals injured on the job in the United States. Through our affiliated clinicians, the company provides occupational medicine, urgent care, physical therapy, and wellness services from more than 530 medical centers in 44 states. In addition to these medical center locations, Concentra serves employers by providing a broad range of health services and operating more than 140 onsite medical facilities. With more than 30 years of experience and nationally recognized clinicians in occupational medicine, Concentra is focused on keeping America's workforce healthy and productive.

Based on this experience, our recommendations for the NCOIL model legislation are below. Additionally, I have enclosed with this letter a proposed redline of Section 5 of the model legislation.

Proposed Changes

1. Clarify the language of Section 5 to cover dispensing by clinicians generally, rather than referring only to emergency departments. A significant percentage of workers' compensation care takes place outside of the hospital setting, including in occupational health centers like those operated by Concentra.
2. Modify the duration limitations on physician dispensing so that Schedule II drugs, and Schedule III drugs containing hydrocodone, are limited to a seven-day supply, while all other drugs are limited to a thirty-day supply. Concentra's experience has shown that administrative barriers to necessary medical treatment increase case duration, and make it more difficult for injured workers to renormalize their lives. Allowing clinicians to dispense up to a thirty-day supply of drugs, other than those specified

www.concentra.com

5080 Spectrum Drive,
1200 West Tower
Addison, Texas 75001
800.232.3550
972.364.8000 ph
972.000.0000 Fax



above, would prevent patient barriers to obtaining those drugs in a timely fashion, and improve compliance with treatment.

3. Base duration limitations on the date of initial injury visit, rather than the date of injury. Many patients wait days or weeks to seek medical care after a work injury, often hoping their symptoms will get better on their own or with first-aid or over-the-counter medications. Accordingly, basing duration limitations on the date of injury would frequently prevent access to care.

If you have any questions, or would like to discuss any of this in greater detail, please let me know. Additionally, as the Workers Compensation Committee moves forward with this proposed legislation, we are happy serve as a resource, providing testimony, data, or other assistance.

Sincerely,

A handwritten signature in black ink, appearing to read 'Gregory Gilbert', written over a faint, illegible typed name.

Gregory Gilbert
Senior Vice President
(972) 364-8000
greg_gilbert@concentra.com