

OAR WC RULES TESTIMONY:

OAR 436-009 MEDICAL FEE AND PAYMENT SCHEDULE

26-FEB-2025

ARGUMENT:

DECREASING TELEMEDICINE (VISITS PROVIDED VIA REAL-TIME VIDEO & AUDIO) REIMBURSEMENT RATES WILL NEGATIVELY AFFECT THE CARE PROVIDED TO WORKERS, AND WILL LIKELY INCREASE INSURER COSTS

FACTS:

- The state of Oregon, as well as the entire USA is currently facing a SHORTAGE of Health Care Providers
- In Oregon, the Behavioral Health Professionals are concentrated in Multnomah County and relatively underrepresented throughout the rest of the state (According to the Oregon Health Authority 2024, pg. 6 top graph)
- Travel is burdensome;
- Travel is time-consuming;
- Travel is costly and
- Travel adds an unnecessary safety hazard (which can be especially troubling for a worker who is a part of the WC system due to an on-the-job vehicular accident)
- Oregon ranks 47/50 regarding access to behavioral health care and prevalence of mental illness (Oregon Health Authority 2024, pg. 11)
- Decreasing the reimbursement for Telemedicine visits, and thus the overall reimbursement for Health Care Providers will likely lead to an exodus of providers participating in the Workers' Compensation Program.

SUPPORTING ARGUMENTS:

- According to research published in JAMA, Telemedicine increases the number of physicians available to see patients
 - If the goal is to get workers back to their job, it makes sense to have the opportunity to utilize all of the physicians / healthcare providers within the state
- Telemedicine is helpful for those who have a rare illness and lack local physicians to treat their condition – this applies to stakeholders on workers'

compensation who may have a unique injury, or require a specialist who is geographically distant from the worker

- According to the research published in JAMA, Telehealth enhances patient convenience:
 - By eliminating travel / travel time
 - Eliminating cost of parking
 - Easing the burden on caregivers
- According to research published in JAMA, Telehealth visits can save money for all stakeholders:
 - Clinics / Physicians / Healthcare workers → telehealth decreases the opportunities for late arrivals or missed appointments, which would require re-scheduling (adding additional administrative and staffing burden)
 - Employers → Telemedicine visits can decrease time away from job for follow-up visits or visits with specialists who are located a great distance from the employer/employee
 - Insurers → With telemedicine, Insurers do not have to pay travel costs (fuel or transportation; lodging/hotel); allows for greater opportunity for retention of Health Care Provider, so decreased instances of redundancy of care or re-starting care with a new provider
 - Worker → Does not need to find childcare (if applicable)
- Telehealth is safer than having to travel long distances for medical appointments
- Telehealth can decrease the likelihood for missed or late appointments – therefore decreasing the overall time for recovery, allowing patient to remain on treatment plan
- Some medical / clinical services provided via telemedicine are the same level of service and care as in-person visits; reduction in rates will unnecessarily penalize these specialties; it will likely reduce access for patients from reduced offerings of telemedicine services; this can be specifically noted in the following specialties:
 - Psychiatry / Mental Health
 - Dermatology

SUMMARY:

Telemedicine provides greater access to Health Care Providers and should be reimbursable at the same rate as in-person appointments. A blanket reduction to telemedicine reimbursements will likely cause measurable harm via reduced availability and access to necessary care for patients.