

February 8, 2025

Gary Cannon
Executive Director
SC Workers' Compensation Commission
via email: gcannon@wcc.sc.gov



Dear Director Cannon:

The South Carolina Orthopaedic Association, representing orthopaedic surgeons throughout South Carolina who are both employed by health systems and working in private practice, is pleased to offer comments related to the proposed Medical Services Provider Manual (MSPM) update.

SCOA was honored to participate in the Ad Hoc MSPM Advisory Committee in 2021. We were encouraged by the Committee's recommendations – particularly that SC's Maximum Allowable Payment (MAP) to authorized providers be increased to mirror the percentage paid by neighboring states and be more closely aligned to the multi-state median values as depicted by the "WCRI Medical Price Index for Workers' Compensation, 13th Edition, May 2021." The current disparity is well-documented in the Committee's recommendations as well as the more current WCRI Medical Price Index for Workers' Compensation, 16th Edition, May 2024.

Unfortunately, we do not believe this recommendation can be achieved by a "fee schedule-neutral" conversion factor designed to reflect a similar level of spending as Fair Health has been instructed to calculate.

The cost incurred by providers to treat injured workers has not been "neutral" for many years; therefore, expecting them to continue providing medical services for neutral payment is unrealistic.

We look forward to future collaboration with Stakeholders and the Commission to pursue medical provider payment reform for workers' compensation services in South Carolina.

Respectfully,

A handwritten signature in black ink, appearing to read "Fraser Cobbe", written in a cursive style.

Fraser Cobbe
Executive Director