

June 30, 2017

Commissioner W. Ryan Brannan

Dear Commissioner Brannan:

We are concerned by the dramatic decrease in the number of physicians who are participating in the Designated Doctor program. According to an open records request of Designated Doctor data, physician participation in the Designated Doctor program decreased by 67 percent from January 1, 2011 (1,361 physicians) to January 1, 2016 (447 physicians).

Without a broad representation of various physician specialties in the Designated Doctor program, it is difficult to ensure that injured employees will have the best resources necessary to evaluate their injury and to determine the most appropriate impairment rating and extent of compensable injury. For some types of injuries, an orthopaedic surgeon may be the only clinician who has the appropriate training and education to address the injury. Orthopaedic surgeons have the highest level of musculoskeletal training, which includes four years of medical school, five years of an orthopaedic residency, and often at least one year in a subspecialty fellowship.

For the well-being of the Designated Doctor program, we believe that it is critical for the Texas Department of Insurance – Division of Workers' Compensation (TDI-DWC) to make regulatory changes in order to increase physician participation in the program.