Rural Area Flexibility Analysis (RAFA)

1. **Types and estimated numbers of rural areas:**

   The emergency adoption and proposed rulemaking adds sacroiliac joint (SIJ) fusion surgery and peripheral nerve stimulation to the list of Special Services requiring prior authorization. Authorized medical providers across New York State, including rural areas, must request prior authorization before performing this surgery.

2. **Reporting, recordkeeping and other compliance requirements; and professional services**

   The same compliance and recordkeeping requirements apply to rural areas as metropolitan ones. Prior authorization requests (PARs) must be submitted in order to perform SIJ fusion surgery and/or peripheral nerve stimulation on an injured worker, which requires that it be medically necessary.

   No special professional services should be required by rural or any other areas.

3. **Costs**

   The Board anticipates that there should be no added costs, as the proposal is simply changing the mechanism for how these surgeries are requested.

4. **Minimizing Adverse Impact**

   The emergency adoption is being filed to ensure that authorized providers do not perform these procedures unnecessarily – adding them to the list of Special Services ensures it is available if it is medically necessary while making it clear that it is only clinically indicated in highly select patients.

5. **Rural area participation**

   The Board will duly consider all public comments received from rural areas during the public comment period.