

## Rural Area Flexibility Analysis

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

The amendment of section 324.2 of Part 324 of 12 NYCRR will apply to all insurance carriers, the State Insurance Fund self-insured employers, self-insured local governments, local governments that own and/or operate hospitals, attorneys, medical providers, group self-insured trusts, third party administrators and claimants across the state. These individuals and entities exist in all rural areas of the state.

### 2. Reporting, recordkeeping and other compliance requirements:

Adoption of the new Medical Treatment Guidelines (Eye Disorders, Complex Regional Pain Syndrome [CRPS] and Traumatic Brain Injury [TBI]) will require all medical providers to adhere to those Guidelines and request a variance, should the requested treatment deviate from the treatment recommended in the Guidelines. The process for requesting a variance and the forms used to request a variance are already in use. It is not anticipated that the proposed amendments will require any additional staffing or resources by rural employers.

### 3. Costs:

The proposed amendment is intended to reduce administrative costs to all parties including rural participants, reduce delays in resolution of disputes, and add clarity and guidance in the treatment of injured workers. As with the original Guidelines adopted in 2010 and the various updates and amendments since, the Board will offer support for this implementation. The Guidelines will be available on the Board's website and anyone will be able to download and print them free of charge. Hard copies may be requested from the Board without a fee.

### 4. Minimizing adverse impact:

As stated above, the implementation of the eye, CRPS, and TBI MTGs is expected to reduce costs and consume fewer resources for all participants in the workers' compensation system including rural participants. The updates will provide greater clarity and guidance.

### 5. Rural area participation:

The proposal will be available for public comment on the Board's website and in the State Register, and the Board will duly consider all public comments received.