

**MEMORANDUM**

TO: Michael Bender, Business Advocate, Common Sense Initiative  
FROM: Pete Mihaly, Ohio Bureau of Workers' Compensation  
DATE: July 11, 2025  
RE: CSI Review – Chapter 4123-6 FYRR Amended Rules (OAC 4123-6-01.2, 4123-6-02, 4123-6-02.2, 4123-6-02.3, 4123-6-02.4, 4123-6-02.5, 4123-6-02.6, 4123-6-02.7, 4123-6-02.21, 4123-6-02.51, 4123-6-03.7, 4123-6-03.9, 4123-6-04.3, 4123-6-07, 4123-6-10, 4123-6-20, 4123-6-20.1, 4123-6-21, 4123-6-21.1, and 4123-6-21.8)

I have received your Memorandum dated July 11, 2025, concluding that the Ohio Bureau of Workers' Compensation should proceed with its filing of the following proposed rules of the Administrative Code with the Joint Committee on Agency Rule Review (JCARR):

- 4123-6-01.2 - Provisional treatment reimbursement approval -- pilot program
- 4123-6-02 - Provider access to the HPP - generally
- 4123-6-02.2 - Provider access to the HPP - provider certification criteria
- 4123-6-02.3 - Provider access to the HPP - provider application and certification criteria
- 4123-6-02.4 - Provider access to the HPP - provider recertification
- 4123-6-02.5 - Provider access to the HPP - provider not certified
- 4123-6-02.6 - Provider access to the HPP -- selection by an MCO
- 4123-6-02.7 - Provider access to the HPP – provider decertification procedures
- 4123-6-02.21 - Provider access to the HPP - non-certified provider enrollment
- 4123-6-02.51 - Provider access to the HPP -- Denial of provider, entity or MCO enrollment/certification based on criminal conviction or civil action
- 4123-6-03.7 - MCO participation in the HPP - bureau's authority to decertify, to refuse to certify or recertify an MCO
- 4123-6-03.9 - MCO participation in the HPP - MCO disclosure of relationship
- 4123-6-04.3 - MCO scope of services - MCO medical management and claims management assistance
- 4123-6-07 - Services and supplies never covered
- 4123-6-10 - Payment to providers
- 4123-6-20 - Obligation to submit medical documentation and reports
- 4123-6-20.1 - Charges for copies of medical reports
- 4123-6-21 - Payment for outpatient medication
- 4123-6-21.1 - Payment for outpatient medication by self-insuring employer

4123-6-21.8 - Reimbursement for services to assist in the discontinuation of medications

At this time, it is the Bureau's plan to move forward with the filing of the proposed rules with JCARR. If you have any questions, feel free to contact me at 1-614-466-3186.

Thank you,

*Pete Mihaly*

Pete Mihaly  
Director of Enterprise Legal Services  
Ohio Bureau of Workers' Compensation