



August 8, 2025

Ms. Heather Jordan, Director
State of NM Workers Compensation Administration
2410 Centre Ave SE,
Albuquerque, NM 87106

RE: Written Comment about proposed 2025 rule changes Part 7

Dear Ms. Jordan,

This letter is written to acknowledge my support for the proposed WCA plan for updating the fee schedule for healthcare provider depositions and for deposition preparation time [(11.4.7.13) Non-Clinical Services].

Per my understanding, the current fee schedule for these services has been in place since 1990 without any update for the past 35 years. This is unreasonable given the increase in the time/cost of providing care to patients. The proposed fee changes would be more consistent with the time commitment necessary for healthcare providers to adequately prepare for depositions.

Updating the schedule is an essential step to ensure that healthcare providers are fairly compensated for these essential non-clinical services. Thank you for your consideration of this important issue.

Sincerely,

A handwritten signature in black ink, appearing to read "A. Manole", with a stylized flourish at the end.

Athanasios K. Manole, M.D.
Medical Director, Modern Pain & Spine