

Utilization Review Petition

In *Gary v. Workers' Compensation Appeal Board (Phila. Sch. Dist.)*, the court upheld the Workers' Compensation Judge's decision which denied the Utilization Review Petition. The UR Reviewer decided that the treatment did not show a "significant improvement" in the claimant's condition and therefore continued treatment was deemed not reasonable or necessary, even though five years prior the same treatment was ruled reasonable and necessary. The court stated that because five years had passed and there was no improvement, nor was their conclusive information from the treating doctor's notes that the claimant's condition was improving, the first UR decision was not necessary for evidence. Thus basing the current review solely on the treatment within those five years, where no improvement was made.