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Submitted via email: MRO@azica.gov



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Re: Comments on 2026 Arizona Physicians' and Pharmaceutical Fee Schedule Proposal

MyMatrixx, an Evernorth company, appreciates this opportunity to provide written comments to the Industrial Commission on its proposed changes to the Physicians' and Pharmaceutical Fee Schedule for 2026. By way of background, MyMatrixx provides pharmacy benefit management services to several workers' compensation insurers, self-insured employers, and third-party administrators specifically in the workers' compensation market in Arizona and throughout the country.

Lowest AWP

First, MyMatrixx supports the Commission's proposed concept of encouraging pharmacies to, whenever possible, seek to procure the medication with the lowest average wholesale price (AWP) if more than one manufacturer produces a medication that is prescribed to an injured worker. While this may not necessarily have any objective enforcement mechanism, we believe it to be good practice for pharmacies given the wide array of options that can exist for one particular drug in terms of manufacturers and disparity in cost that also stems from that. This language may to some extent discourage 'NDC shopping,' where certain providers intentionally choose national drug codes (NDCs) for drugs that have a higher AWP in order to maximize their profit, but time will tell. Given the ambiguity in enforcement of this, long-term we encourage developing a more objective way to cap costs in the fee schedule for the more commonly problematic NDCs.

Incorporation of OTCs

Second, we also support the proposed addition of "and over-the-counter (OTC)" in multiple provisions under the fee schedule's section addressing reimbursement for medications dispensed by a healthcare provider or in a pharmacy not accessible to the general public. While we have had concerns with the "not accessible to the general public" and "commercially available" language in this existing section being potentially ambiguous or at least debatable between parties, we do think acknowledging that OTC medications should also be subject to similar reimbursement conditions and limitations is a good policy. Long-term, we continue to encourage the Commission to review its fee schedule as a whole with respect to its use of these terms to determine whether they can be omitted or refined to be more objective in their practical application, if statute permits.

Continued Review of Topicals

Finally, it is our understanding that while the proposed changes for May 1, 2026, do not expressly address prescription topicals in response to Commission dialogue with stakeholders on that specific topic over the last



several months, it is still the intent of the Commission to propose further amendments to the fee schedule to address that category of medications later. To that end, we continue to offer our support to the Commission in that effort and look forward to continued dialogue as the process progresses hopefully later this year.

Conclusion

MyMatrixx thanks the Commission for this opportunity to provide written feedback on these latest proposed amendments. We appreciate your consideration of our comments. If you have any questions regarding our comments, please contact me for further discussion.

Sincerely,

A handwritten signature in black ink that reads "Adam Fowler".

Adam Fowler

Director, Workers' Compensation Regulatory Affairs

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