



## ***Proudly Serving Arizona Employers Since 1983***

November 30, 2017

Dale Schultz, Chairman  
Industrial Commission of Arizona  
800 W. Washington St.  
Phoenix, AZ 85007

RE: Expansion of Evidence Based Medicine Guidelines

Dear Chairman Schultz:

Thank you for the opportunity for the Arizona Self-Insurers Association (ASIA) to provide comments on the proposed expansion of evidence based guidelines.

In 2012, ASIA was instrumental in helping pass HB 2368, creating A.R.S. §23-1062.03:

*“The Commission shall develop and implement a process for the use of evidence based-based medical treatment guidelines, where appropriate, to treat injured workers no later than December 31, 2014.”*

Although the original intent of the bill was for the Commission to implement the guidelines for all workers' compensation injuries, the Director's Advisory Committee made the decision to limit them for just pain management issues. ASIA supported this decision with the understanding the guidelines would eventually be fully implemented.

Therefore, ASIA wholly supports the Commission's proposal to expand the guidelines based on the following:

1. Expansion would bring the Commission into compliance with the intent of A.R.S. §23-1062.03.
2. Expansion would provide greater control over opioid medications for all injuries and pain management, consistent with the Governor's objectives.
3. Over the past 5 years, the Commission has developed the internal infrastructure- including staff, rulemaking and policies- to support full expansion of the guidelines.
4. The Commission has solicited feedback from medical specialists in key areas who support the expansion, as well as publicly posted additional studies supporting the use of guidelines in all injuries.

**Susan Strickler, President**  
*Arizona Counties Insurance Pool*

**Dawn Chambers, Vice-President**  
*Ashton Tiffany/The Alliance*

**Seema Lord, Treasurer**  
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**Wendy Mueller, Secretary**  
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**Jim Gill, Board Member**  
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*SIU Consultant Group Investigators*

**Christopher Norton, Board Member**  
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**Manny Tarango, Board Member**  
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**Erin Taylor, Board Member**  
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### ***Arizona Self-Insurers Association***

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ASIA Feels the expansion is not only required by statute, but should be done as quickly and prudently as possible. ASIA supports the Commission's ongoing efforts to fully implement evidence based medicine guidelines and is thankful for the opportunity to have participated in the years of stakeholder efforts led by the Industrial Commission following HB 2368's original passage in 2012.

Sincerely,

*Susan Strickler*

Susan Strickler  
President  
Arizona Self-Insurers Association