



August 17, 2020

Industrial Commission of Arizona  
c/o Charles Carpenter, Manager  
Medical Resource Office  
P.O. Box 19070  
Phoenix, AZ 85005-9070  
[mro@azica.gov](mailto:mro@azica.gov)

Dear Mr. C. Carpenter,

Please accept our comments in response to the Amended Staff Proposal 2020/2021 Arizona Physicians' and Pharmaceutical Fee Schedule.

Healthsystems would like to thank the Commission for considering our recommended changes pertaining to the *Physical Medicine Guidelines*. The adoption of the Centers for Medicare and Medicaid Services (CMS) guidelines for time-based codes ensures consistency in billing and reimbursement. The proposed changes remove ambiguity, increase efficiency, and benefit both providers and payers; we fully support the Commission's adoption of these standards.

Thank you for your consideration,

A handwritten signature in blue ink, appearing to read 'Isabel Hernandez'.

Isabel Hernandez  
Advocacy and Compliance Analyst  
[IHernandez@Healthsystems.com](mailto:IHernandez@Healthsystems.com)

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