



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

RE: 2020-2021 Physicians' and Pharmaceutical Fee Schedule

Dear Members of the Industrial Commission of Arizona:

The American Property Casualty Insurance Association (APCIA) welcomes the opportunity to provide comments on the Industrial Commission of Arizona's (ICA) Amended 2020-2021 Physicians and Pharmaceutical Fee Schedule Staff Proposal. APCIA represents nearly 60 percent of the U.S. property casualty insurance market and the broadest cross-section of home, auto, business and workers' compensation insurers of any national trade association. In Arizona, APCIA members make up 80% of the workers' compensation insurance market.

APCIA strongly supports the ICA's amendments to Section VII. These amendments clarify the exceptions for when payments must be made to a "pharmacy not accessible to the general public." Specifically, the amendments allow payments to "non-accessible" pharmacies when an injured worker appeals a denied claim that is subsequently accepted. By proposing these amendments, the ICA thoughtfully balances the pharmacy needs of injured workers while limiting unnecessary costs to Arizona's workers' compensation system. As such, APCIA urges the ICA to adopt the Amended 2020-2021 Physicians and Pharmaceutical Fee Schedule staff proposal.

Thank you for the opportunity to provide comments.

Sincerely,

A handwritten signature in black ink that reads "Jeremy Merz". The signature is fluid and cursive, with a large initial "J" and a stylized "M".

Jeremy Merz
Vice President, State Government Relations
(530) 902-3937
Jeremy.Merz@apci.org