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August 5, 2020

Charles Carpenter, Manager
Medical Resource Office
Industrial Commission of Arizona
800 W. Washington
Phoenix, AZ 85007

RE: 2020-2021 Arizona Physicians' and Pharmaceutical Fee Schedule

Dear Mr. Carpenter:

Thank you for the opportunity to comment on the proposed changes to the 2020-2021 Arizona Physicians' and Pharmaceutical Fee Schedule:

- The Arizona Self-Insurers' Association (ASIA) supports the changes to the definition of pharmacy- specifically the clarification of "pharmacy not accessible to the general public." Over the years, ASIA has worked with the Commission and other stakeholders to reduce the potential for opioid abuse. This definition change will help with that endeavor by limiting drug access points that are outside mainstream pharmacies that are subject to stronger protocols.
- Many carriers, third-party administrators and self-insured employers utilize pharmacy benefit managers to provide oversight and flag potential issues with medications such as prescriptions that are filled too soon or if an employee presents prescriptions at multiple pharmacies. When an employee receives medications through an out-of-state, limited pharmacy there is no oversight. Often, the carrier/TPA/self-insured employer does not know medication has been distributed until they receive a bill in the mail.
- ASIA fully supports the proposed language in VII(D). Again, this language will limit the potential for abuse while ensuring the health and safety of the employee by requiring drug conformity of "dosages and formulations that are commercially available in pharmacies that are accessible to the general public."

ASIA believes the proposed changes will not only provide a stronger workers' compensation system in Arizona but protect employees from potential medication issues and opioid abuse.

Sincerely,

Susan Strickler

President

Arizona Self-Insurers Association

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