



July 22, 2021

Via electronic mail to mro@azica.gov

Industrial Commission of Arizona
c/o Charles Carpenter, Manager
Medical Resource Office
P.O. Box 19070
800 W. Washington Street
Phoenix, AZ 85005-9070

Re: 2021-2022 Physicians' and Pharmaceutical Fee Schedule Public Hearing

Dear Members of the Industrial Commission of Arizona:

CopperPoint Insurance Companies ("CopperPoint") is pleased to provide written comments in connection with the Industrial Commission of Arizona's ("Commission") annual review of the Physicians' and Pharmaceutical Fee Schedule and consideration of the preliminary proposal prepared by Commission staff ("staff proposal"). CopperPoint specifically supports the Commission's review of current pharmaceutical reimbursement methodologies to ensure transparency, reasonableness, and effectiveness.

Medical expenses are the leading cost driver in Arizona's workers' compensation system, and prescription medications account for approximately 20% of those medical costs. CopperPoint appreciates the Commission's ongoing efforts to reduce unnecessary medical costs in the system, while ensuring that providers are fairly and appropriately reimbursed and that injured workers have access to quality care. In our opinion, a fee schedule based upon transparency and an accurate reflection of the cost of pharmaceuticals can best support those efforts. We understand that the current staff proposal is a preliminary document and discussions on appropriate amendments to the Pharmaceutical Fee Schedule guidelines will continue. CopperPoint looks forward to being a part of those conversations.

Thank you for your work and for your consideration of our comments.

Sincerely,

Mark A. Kendall

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VP, Legal Services

PHOENIX

3030 N 3rd Street
Phoenix AZ 85012-3039
Telephone: 602.631.2150
Fax: 602.631.2188

Ronald C. Wills
Managing Attorney

Deborah E. Mittelman
Sharon M. Hensley
John W. Main
Chiko Swiney

TUCSON

698 E Wetmore Ste 440
Tucson AZ 85705-1753
Telephone: 520.292.4050
Fax: 520.292.4033

Jean Kamm Gage
Managing Attorney

Joseph N. Lodge