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Date: Mon, Jul 19, 2021 at 11:39 AM  
Subject: Proposed Prescription Fee Schedule  
To: MRO - INDUSTRIAL COMMISSION <[mro@azica.gov](mailto:mro@azica.gov)>

Mr. Carpenter:

This email is to express concern about the newly proposed prescription fee schedule for workers' compensation claims in the state of Arizona.

As you are aware, the staff proposal suggests switching primary pharmacy reimbursement models from the customary and nationally recognized methodology of Average Wholesale Price (AWP) to National Average Drug Acquisition Cost (NADAC), which California, and only California, adopted. That was purposeful on behalf of all other state regulators. The fee schedule proposed is so low that it may drive current specialized workers' compensation pharmacies out of the market and put my clients' recovery at risk.

I represent injured workers exclusively. One of the biggest issues I deal with daily in my practice is medication authorization issues. I will contact the adjusters and the majority of the time it takes days, sometimes weeks, to fix these issues. These issues constantly delay my clients' treatment and recovery. My saving grace has constantly been pharmacies like Injured Workers' Pharmacy (IWP) who will dispense clients' medication immediately and work with me to get authorization. This allows my client to obtain treatment right away without the delays the carriers create in obtaining authorization for medications. Without specialty pharmacies, my clients will suffer greatly.

The goal of the Commission should be to institute a reimbursement methodology that ensures patient choice, quality care, and keeps premiums at reasonable levels to attract business to the state. In direct conflict with that charge, the proposal reduces a patient's ability to choose their pharmacy by forcing workers' compensation specialty pharmacies to reevaluate whether they can continue to fill prescriptions for patients throughout the tenuous litigation process.

With a reduction in pharmacy options, injured workers may experience delays, leading to a lack of medication adherence and ultimately an extension of their recovery time and return to work.

I please ask that you reconsider and keep the current fee schedule in place to allow my clients to utilize their workers' comp pharmacy. Injured workers in Arizona should have access to obtain the medications they need in an expedited manner during their recovery and during litigation of their workers' compensation claims. The Commission should be protecting injured workers' rights in Arizona as opposed to placing roadblocks that make an already difficult system more difficult for the injured worker. On behalf of all injured workers in Arizona, please reconsider and keep the current fee schedule in place.

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