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Physician Dispensing - Public Comment

1 message

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Thu, Sep 13, 2018 at 1:19 PM

To: "mro@azica.gov" <mro@azica.gov>

September 13, 2018

Ms. Jacqueline Kurth
Manager
Medical Resource Office
800 West Washington Street
Phoenix, AZ 85007

Dear Ms. Kurth:

Thank you for the opportunity to provide comment on the recent report, *Physician Dispensing in Workers' Compensation White Paper* for the Industrial Commission of Arizona.

I am the director of healthcare policy at the Goldwater Institute. In that capacity, I analyze federal and state-level reforms across the country related to healthcare.

State policymakers' interest in issues of physician dispensing in workers' compensation programs is common across multiple states. What isn't common, however, is the unique set of laws and reforms that already govern physician prescribing in Arizona.

The Public Consulting Group's July analysis falls woefully short in several areas and, unfortunately, fails to provide the quality of analysis necessary to guide important policy for the state. In particular, the white paper provides no discussion of how the state's recent policy and legislative changes on opioids should inform physician dispensing policy. Nor does the paper discuss how the state regulates the practice of medicine or the existing requirements on the state's pharmacies.

The entire white paper makes only two passing mentions of Arizona. Page 1 includes a statistic on the frequency of physician dispensing. Page 11 mentions that Arizona was one of the states that adopted a fee schedule rule. A summary table of state-by-state regulations includes Arizona but, once again, the discussion is severely lacking.

Perhaps the most concerning shortcoming of the paper is that fails to consider how changes in physician dispensing rules might affect provider access and health outcomes.

The Industrial Commission's responsibility for this important issue requires insightful and meaningful analysis specific to the state. Once again, thank you for the opportunity to comment.

Sincerely,

Naomi Lopez Bauman
Director of Healthcare Policy

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